

## **Safety Policy and Procedures**

### **1.0 Introduction**

#### **1.1 General Information**

A Site-Specific Safety Plan is a requirement of the OSHA Standard for Construction 29 CFR 1926. This plan is designed to identify, evaluate, and control health and safety hazards for the purpose of protecting employees. The plan provides for emergency response activities at the jobsite as well as covering site hazard analysis, training requirements, engineering controls, materials handling, and safe construction operations. This Site-Specific Plan is intended to provide guidance and information in dealing with the hazards that may be faced on the job by ASKW-Davis, LLC employees. This plan is a site specific document. Technical, Contract and/or Operational Managers are responsible for ensuring all aspects of employee safety are addressed in this plan. Health and safety personnel are available to assist management with the contents of the plan. The health and safety personnel help ensure the plan complies with all applicable federal, state, and corporate regulations and policy. The Health and Safety Department has final authority for this plan's contents and provisions.

#### **1.2 Policy**

ASKW-Davis, has a strong commitment to providing a safe and productive workplace. To this end ASKW-Davis, LLC seeks to establish policies promoting high standards of employee health and safety while delivering to our customer the highest quality product. In keeping with this commitment ASKW-Davis, LLC intends to maintain a positive Safety Program and a Substance-Abuse Program. Our employees conduct themselves and work in a safe manner with good construction practices. Effective safety demands cooperation on everyone's part. It's important communication is kept open at all times. For this reason, ASKW-Davis, LLC management practices an open-door policy. Employees who notice hazards or other safety problems or feel they need additional training must notify their supervisor. Supervisors and management address these concerns and take corrective action when warranted.



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Responsibility for achieving our safety goals belongs to the site superintendent, safety manager, supervisors, foreman, employees, with the support of ASKW-Davis, LLC management. Everyone is obligated to know the safety requirements and standards for their areas or job and abide by them. Supervisors must instill a positive attitude and awareness of the “safety culture” in their workers through personal adherence, training, personal contact, and regularly scheduled safety meetings. It’s the duty of all employees to perform their work with maximum regard for their safety and co-workers’ safety. Our safety policies are an integral part of the ASKW-Davis, LLC personnel policies. This means compliance with the policies is a condition of employment and must be taken seriously. Failure to comply with the Safety Program and Policy is grounds for disciplinary action up to and including termination.

**1.3 Purpose**

The purpose of this Site-Specific Safety Plan is to illustrate safety issues specific to the YKHC-PJC Project. This site safety plan is consistent with the Safety Program and Policies located in the Corporate Safety Plan.

This plan is intended to maintain a safe work environment and effectively reduce the number of accidents resulting in personal injury, property damage, and damage to ASKW-Davis, LLC equipment.

This policy applies to all ASKW-Davis, LLC employees. By contract, all subcontractors are required to comply with this policy in addition to their own safety program and policy.

This policy complies with applicable local, state, and federal laws concerning safety including 29 CFR 1926 and 29 CFR 1910. In the event a discrepancy exists between this policy and any applicable law, the provisions of that law govern.

This policy is made available in the following ways:

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- A copy of this revised policy is made available to each newly hired employee in his/her new hire packet.
- A copy of this revised policy is available in the job site office.
- A copy of this revised policy is available upon request to the supervisor.

## **2.0 Scope of Project**

### **2.1 Scope of the Work**

The YKHC Paul John Calricaraq Project, New Clinic and Hospital Renovation will consist of a 130,000 sf. new clinic and 60,000 sf. renovation to the existing hospital.

The work will be executed during the 2016 summer season and 2017 summer season. During the 2016 season the work will consist of barging vehicles, equipment, and supplies, plus mobilization of project offices and crew trailers. Construction work during 2016 will consist of site work, man camp construction, warehouse construction, installation of utilities, fencing of site and storage yard, and pile driving.

During 2017 New Clinic and Hospital renovation will commence. This work will include demolition, pilings, foundations, steel erection, roofing, decking, metal stud installation, glazing and siding, exterior and interior finishes, paving, utility up-grades, and hospital equipment installation.

Phase of Work/Hazardous Activities: (List not inclusive and may change as needed.)

### **2.2 Site Location**

Bethel, Alaska

### **2.3 Site Access/Traffic**

Chief Eddie Hoffman Hwy.

**2.4 Temporary Facilities**

At the start of the project ASKW-Davis, LLC will have a field office as well as crew and subcontractor trailers adjacent at the designated location. At this location there will also be a tool and equipment storage trailer, fuel storage, and temporary toilets.

**2.5 Utilities and Power**

Temporary electrical power will feed to the project from existing services. Once the structure is substantially complete, existing utilities will provide permanent power and steam to the building.

**3.0 Health and Safety Responsibilities**

The effectiveness and success of the safety program depends upon the active participation and cooperation of all employees. Duties and responsibilities of all employees under this policy are the following:

**3.1 Corporate Safety Coordinator**

- Coordinate health and safety training for management and supervisors.
- Coordinate monthly supervisor safety meetings.
- Coordinate jobsite safety audits.
- Maintain and revise the Safety Policy, Corporate Safety Manual, and Site-Specific Safety Plans as needed.

**3.2 Project Safety Manager**

- Maintain the jobsite postings and notices required by law.
- Ensure the proper filing of paperwork relating to accidents.
- Participate in post-accident investigations.
- Maintain all records and reports related to this policy.
- Implement ASKW-Davis, LLC Safety Program and Policy including hazard analysis and development JHA's prior to all preparatory meetings and associated construction activity, complete daily comprehensive, documented project inspections and direct corrective action as needed.

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**3.3 Project Manager**

- Approve the Site-Specific Safety Plan.
- Direct and coordinate health and safety regulations related to his/her area of responsibility.
- Participate in post-accident investigations.
- Assist in formulating policy matters.
- Implement ASKW-Davis, LLC Safety Program and Policy.

**3.4 Project Superintendent assisted by Project Safety Manager**

- Be familiar with the health and safety regulations related to area or responsibility.
- Direct and coordinate health and safety activities within area of responsibility.
- Ensure arrangements for prompt medical attention in case of serious injury. These arrangements include, at the very least: transportation, communication, and emergency telephone numbers.
- Ensure all supervised employees use required personal protective equipment (PPE) and safety devices.
- Ensure safety equipment is available, maintained, used, and stored correctly.
- Instruct and train all employees within area of responsibility in job health and safety requirements.
- Direct correction of unsafe conditions.
- Conduct weekly safety meetings.
- In the case of an accident complete the Report of Occupational Injury or Illness.
- Participate in post-accident investigation.
- Review all accidents/incidents with foremen and employees involved. Ensure corrective action is taken immediately to eliminate the cause of the accident.
- Ensure foremen are aware of and comply with requirements for safe practices.
- Require all subcontractors to comply with health and safety regulations as well as ASKW-Davis, LLC Safety Program and Policy.

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- Maintain copies of applicable programs and OSHA forms on site, in accordance with ASKW-Davis, LLC practices and policies.
- Implement ASKW-Davis, LLC Safety Program and Policy.

**3.5 Foreman**

- Be familiar with, explain, and enforce health and safety regulations applying to ASKW-Davis, LLC operations within areas of responsibility.
- Direct and coordinate health and safety activities within area or responsibility.
- Ensure safety devices and proper PPE are used by employees under supervision.
- Instruct and train all employees within area of responsibility in job health and safety requirements, including (but, not limited to) hazard recognition and avoidance. Also, foreman/front line supervisors must require compliance by employees with the established safety rules.
- Direct the correction of unsafe conditions.
- Ensure safety equipment is available, maintained, used, and stored correctly.
- Ensure injuries are treated promptly and reported.
- Participate in post-accident investigations.
- Coordinate daily jobsite inspection.
- Implement ASKW-Davis, LLC Safety Program and Policy.

**3.6 All Employees**

- Be familiar with and comply with proper health and safety practices.
- Use the required safety devices and proper PPE.
- Notify the supervisor immediately of unsafe conditions/-acts, accidents, and injuries.
- Implement the ASKW-Davis, LLC Safety Program and Policy.

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**3.7 Subcontractors**

By contract subcontractors comply with and ensure the compliance of their employees with the provisions of this policy as well as their own safety program. Failure to fulfill this requirement is a failure to meet the conditions of the subcontract.

**3.7 Key Personnel**

The following personnel are key individuals for this jobsite.

Project Manager:	Jerry Bryant
Safety Coordinator:	Kirk Waggoner
Project Superintendent:	TBD
Project Safety Manager:	TBD
Project Engineer:	TBD
Foremen:	TBD

**4.0 Prohibited Conduct**

**4.1 Repairs**

Employees are prohibited from making repairs, alterations, or attachments to equipment in the field except by the permission of the superintendent, foreman, or equipment mechanic. Only qualified personnel will perform repairs on equipment. Such repairs, alterations, or attachments are documented on the appropriate shop forms.

Employees are prohibited from removing a guard, safety device, or appliance from equipment or machinery except to make repairs as described in 4.1 first paragraph. While making repairs, employees use appropriate lockout/tagout procedures. When repairs are complete the guard, safety device, or appliance is replaced immediately.

**4.2 Equipment Use and Operation**

Equipment is used only for its intended use and as recommended by the manufacturer. Using equipment for purposes other than what it's designed for is prohibited.

Employees are prohibited from operating a vehicle in a reckless manner or at a speed greater than is reasonable and proper, with

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due regard for weather, traffic, character of roadway, load, type of vehicle, and any other conditions which may affect the safe operation of the vehicle. The vehicle must be kept under control at all times and special care is exercised when transporting personnel. Employees using company vehicles must sign and abide by the Company Vehicle Policy.

Employees may only ride equipment if there are seats with seatbelts or equal protection available for each person. Seatbelts are worn at all times while operating equipment with seats. Forklift policy and procedure are located in TAB 13 of this SSP binder.

**4.3 Personal Protective Equipment (PPE)**

ASKW-Davis, LLC provides Personal Protective Equipment (PPE) to all employees. Hard hats, safety glasses, reflective vest, and safety work boots are required to be worn at all times when on the jobsite. Exceptions may be made to this PPE requirement only under an approved ASKW-Davis, LLC work plan. Employees learn where to get PPE during their new-hire orientation and are responsible for wearing and maintaining the required PPE. Additional PPE may be required depending on the task and if there's a potential for exposure to hazardous conditions. PPE requirements are reviewed by the foreman. Employees are expected to use reasonable judgment regarding whether additional PPE (beyond the required) are necessary for certain tasks. If employees are unsure of the type of PPE required for a specific task or job, they should ask the supervisor.

**4.4 Conduct**

The following conduct is prohibited and may result in discipline up to and including termination:

- Scuffling, fighting, or horseplay on the job.
- Making a false report or misrepresentation.
- Violating the prohibitions of the Drug and Alcohol Policy (distributed to each employee in their new-hire packet).
- Dishonesty and theft of property.
- Deliberate misuse of equipment.



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- Unnecessary risk taking.
- Violating or disobeying any instruction given by a supervisor.

**4.5 Other Policy Violations**

Employees committing policy violations other than those addressed in Section 4.0 may be subject to discipline up to and including immediate termination of employment.

**4.6 Consequences for Policy Violations**

The following consequences apply to all employees found to have violated this policy. Any foreman, supervisor, or official of management, as soon as becoming aware of any such failure, ensures the following action is taken:

**Stage 1**

A formal verbal warning may be given to the employee by the immediate supervisor, along with a warning that this is the first stage in the disciplinary procedure and any repetition within one month will lead to the second stage in the procedure.

**Stage 2**

If the offense(s) addressed in Stage 1 is repeated and/or continued or a more serious offense committed, the employee may be given a formal written warning, setting out the details of the offense(s) and stating if the offense(s) is (are) repeated within one month the third stage in this procedure will be invoked. In addition to the written warning the employee is suspended—without pay—for a period of one day. Upon returning to work the employee must undergo additional formal training in the area of the offense(s) before being permitted to work. This is to prevent injury to the employee or co-worker.

**Stage 3**

If an offense written up under Stage 2 is repeated within three months, the employee may be terminated. An employee so terminated is ineligible for rehire for 24 months.

Depending on circumstances, ASKW-Davis, LLC reserves the right to bypass, duplicate, or alter any stage of the recommended disciplinary procedures described above.

## **5.0 General Jobsite Procedures**

### **5.1 New-Hire Orientation**

New-hire orientation may consist of, but is not limited to, the following:

- A. Have the employee read the new-hire packet which includes this policy and the Drug and Alcohol Policy. Answer any questions the new hire may have about these policies and request a signature on the Statement of Understanding.
- B. Return all forms to the ASKW-Davis, LLC office as indicated on the first page of the new-hire packet.
- C. Orient the employee to the jobsite indicating the location of the Safety Center, SDS book, emergency facilities, portable fire extinguishers, first-aid station, emergency phone numbers, public notices, EEO, and any jobsite specific information.
- D. Explain the injury and accident policy.
- E. Review the written hazard communication program. Discuss hazards, container labeling, and use of protective equipment.
- F. Explain the emergency response plan for catastrophic events such as fire, explosion, etc.
- G. Issue PPE as required for the job.

### **5.2 Training**

Training and education are necessary for the success of this policy. Employees are trained to recognize jobsite hazards and the procedures to follow to minimize these hazards. Training may consist of (but is not limited to) the following:

- Weekly jobsite safety meetings.
- Orientation training for new hires.
- Individual job/task training, including the applicable regulations/standards for the specific job/task.

Supervisors and management receive ongoing safety training throughout the year as organized by the Safety Coordinator and as deemed necessary by ASKW-Davis, LLC owners. Such training includes the maintenance of first-aid and CPR cards.

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**5.3 Safety Meetings**

Weekly safety meetings are held on the jobsite. All employees and subcontractors are required to attend. The meetings may cover a range of safety-related topics. The format and content of the meeting is up to the discretion of the superintendent.

Monthly safety meetings are held for all foremen, superintendents, project managers, project engineers, owners, and other management personnel. These meetings are for the purpose of discussing companywide safety issues and providing continued safety training and education.

Safety meeting documents are located in  
Tab 24 – FORMS of this SSSP binder.

**5.4 Safety Inspections**

The superintendent and foreman conduct an initial safety inspection at the beginning of each project, following the “Safety Inspection Guide” included in the site-specific safety plan. In addition, a daily safety inspection of the jobsite is conducted by ASKW-Davis, LLC employees, employees of a subcontractor, or some combination thereof. The inspection is rotated between all workers on the jobsite. Inspection sheets covering different aspects of safety were developed for each day of the week. The sheets are intended as a guide. Any safety concern found during the inspection is reported. If a worker is unclear about any item on the inspection sheet, a foreman or safety officer helps. If the area being inspected requires a competent person, the employee conducts the inspection with the competent person. Also, if time allows, the foreman for the worker conducting the inspection is encouraged to walk through it with them.

**5.5 Hazard Communication**

ASKW-Davis, LLC developed a written hazard communication plan. It’s explained to each employee during the new-hire orientation. This plan is located in the site-specific safety plan appendices and is available upon request to the superintendent. The purpose of the hazard communication plan is to provide

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employees information on the chemical and physical hazards that may be present at the jobsite.

The Hazard Communication Plan is detailed in  
Tab 8 – HAZARD COMMUNICATION PLAN of this SSSP binder.

**5.6 Job Hazard Analysis**

A job hazard analysis may be developed covering the major activities of construction, the hazards associated with these activities, and ways to mitigate these hazards.

The job hazard analysis procedures and forms are detailed in  
Tab 23 Job Hazard Analysis of this SSSP binder.

**5.7 Housekeeping**

Housekeeping is one of the most important factors for a safe jobsite. Form material should be scraped and all protruding nails pounded down. All other debris is cleared from work areas, passage ways, and stairs. Excess materials are stacked neatly out of the way. Tools should be stored in the tool van so they're available for all employees to use.

Combustible scrap and debris are removed at regular intervals during the course of construction. Containers with covers are provided for the collection and separation of waste, trash, oily and used rags, and other such refuse, which is removed safely and on a regular basis.

Foreign object and debris (FOD) is a significant concern on medical facilities and construction areas. It's extremely important to keep all trash and debris contained at this site. Housekeeping will be strictly enforced.

**5.8 Fall Protection**

ASKW-Davis, LLC provides fall protection when employees are exposed to fall hazards beyond those permitted by federal and/or state regulations. A fall-protection work plan is prepared for all fall hazards associated with the work. Fall protection work plan templates can be found in Tab 9 – FALL

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PROTECTION of this binder. Fall protection may consist of, but is not limited to, the following:

- A stairway or ladder is provided at any point of access where there's a break in elevation of 19 inches or more.
- Guardrails are installed for all leading edge work. For loading bay locations fall-arrest system or fall-restraint systems are used.
- All stairways of four or more risers or greater than 30 inches high are guarded by a handrail or stair rails.
- A hole cover or safety guardrail is immediately installed for all floor holes or openings (greater than two inches in its least dimension).
- Safety harnesses with approved lanyards and tie-off points are used for all other fall protection unless an appropriate procedure or device was approved in advance by a competent person.

The fall-protection plan is detailed in  
Tab 9 – FALL PROTECTION AND ELEVATED SURFACE WORK  
EMERGENCY ACTION AND RESCUE PLANE of this SSSP binder.

### **5.9 Electrical Safety**

Electrical safety may consist of, but is not limited to, the following:

- Live electrical parts are guarded against accidental contact by cabinets, enclosure, location, or guarding.
- All receptacles not part of the permanent wiring of the building are equipped with GFCI receptacles at the temporary service drop.
- Extension cords are kept in safe, working condition.
- All lamps for general illumination have the bulbs protected against breakage. All light sockets are filled with a working bulb.
- Employees will not work in such close (able to contact) proximity to any part of an electric power circuit unless the circuit is de-energized, grounded, or guarded by insulation.

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- De-energized equipment or circuits are locked out and tagged out. The tags identify the equipment or circuits being worked on.

Electrical Safety is located in  
Tab 17 – ELECTRICAL SAFETY PROGRAM of this SSSP Binder

**5.10 Tools**

ASKW-Davis, LLC provides tools for employees to use. These tools meet applicable OSHA standards for safety. Only trained employees are allowed to use such tools. The safe use of tools may consist of, but is not limited to the following:

- Unsafe or defective tools are removed from service and tagged out.
- Power tools are turned off and motion stopped before setting down.
- Tools are disconnected from the power source before changing drills, blades, or bits and before any repair or adjustment is made. Power saws, table saws, and radial arm saws shall have operational blade guards installed and used.
- Portable abrasive grinders have guards installed covering the upper and back portions of the abrasive wheel.

**5.11 Scaffolds**

Scaffolds are erected, moved, dismantled, or altered under the supervision of a competent person for scaffolding. Scaffold use consists of, but is not limited to, the following procedures:

- Standard guardrails are installed on all open sides and ends of scaffold platforms and/or work levels more than ten feet above the ground, floor, or lower level.
- Scaffolds four to ten feet in height with a minimum horizontal dimension in any direction less than 45 inches have standard railings installed on all open sides/ends.
- Platforms at all working levels are fully planked. Planking is laid tight with no more than one inch space between them, overlap at least 12 inches, and extends over end supports 6-12 inches unless cleats are used.
- The front edge of all platforms is no more than 14 inches

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from the face of the work, except plastering/lathing may be 18 inches.

- Mobile scaffolds are erected no more than a maximum height of four times their minimum base dimension.
- Scaffold casters/wheels are locked whenever platform is occupied.
- Scaffolds are not overloaded beyond their design loadings.
- Scaffold components are not used as tie-off/anchor points for fall-protection devices.
- Portable ladders, hook-on ladders, attachable ladders, integral prefabricated scaffold frames, walkways, or direct access from another scaffold or structure are used for access when platforms are more than two feet above or below a point of access.
- Cross braces are not used as a means of access to scaffolds.
- Scaffolds are not erected, used, dismantled, altered, or moved such that they or any conductive material handled on them might come close to exposed and energized power lines than the following:
  - Three feet from insulated lines of less than 300 volts;
  - Ten feet plus for any other insulated or uninsulated lines.

Scaffold Safety is located in

Tab 18 – SCAFFOLD SAFETY PROGRAM of this SSSP Binder

### **5.12 Excavation and Trenches**

Excavation and trenching are done in the presence of a competent person and in compliance with, but not limited to, the following procedures:

- Any excavation or trench four feet or more in depth is provided cave-in protection through shoring, sloping, benching, or the use of hydraulic shoring, trench shields, or trench boxes. Trenches less than four feet in depth and showing potential of cave-in are also provided cave-in protection. In addition, when the work to be performed in trenches less than 4 feet in depth mandates that workers

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work from a kneeling or crouching position, additional protection shall be provided. Specific requirements of each system are dependent upon the soil classification as determined by a competent person.

- A competent person inspects each excavation/trench daily prior to the start of work, after every rainstorm or other hazard increasing occurrence, and as needed throughout the shift.
- An exit is provided in trenches four feet or more. The exit(s) is/are within 25 feet of any employee in the trench.
- Spoil piles and other equipment are kept at least two feet from the edge of the trench or excavation.

The excavation plan is detailed in TAB 10 – TRENCHING and EXCAVATION of this SSSP binder.

**5.13 Ladders**

Ladders are inspected during the weekly inspections to identify any unsafe conditions. Any ladders found to be unsafe are taken out of service. Extension ladders extend three feet above the work surface and are 100 percent tied off. Step ladders are only used in the open position. Ladders are stored lying down.

Ladder Safety is detailed in  
Tab 15 – LADDER SAFETY PROGRAM of this SSSP binder.

**5.14 Illumination**

Construction areas, aisles, stairs, ramps, runways, corridors, offices, shops, and storage areas where work is in progress are lighted with either natural or artificial illumination.

**5.15 Motor Vehicles and Mechanized Equipment**

Vehicles and equipment are only operated by qualified persons (training or experience). The superintendent maintains equipment training logs. Employees operating ASKW-Davis, LLC -owned vehicles must sign and abide by ASKW-Davis, LLC Vehicle Policy.



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All equipment operators are responsible for checking, on a daily basis, all fluid levels, drive components, and hydraulics. In addition, operators visually inspect the engine and look for structural breaks and cracks on the machine. Any and all deficiencies must be reported to a supervisor immediately. When equipment is stopped or parked, parking brakes are set and other safety precautions are taken as required for the type of equipment such as placing the forks flat on the ground.

**5.16 Severe Weather**

Outside construction operations including, but not limited to, steel erection, site work, and concrete work are suspended if severe wind or rain conditions present safety hazards at the worksite. Ice and snow hazards are evaluated and appropriate measures taken to abate potential hazards. The “Buddy System” will be invoked for outside work at temperatures of -40F or below.

**5.17 Accidents**

All accidents and near misses must be reported immediately to the foreman or superintendent. An accident report is then filled out by the employee and the supervisor. Filling out an accident report does not require the delay of medical attention. Any injury is treated first. Employees file such reports without fear of reprisal by management. The accident or incident may be discussed at weekly safety meetings or in the Safety Alert to talk about how to avoid that sort of accident in the future.

Accident prevention and investigation procedures and documents are located in Tab 7 – ACCIDENT PREVENTION and REPORTING PROCEDURES of this SSSP binder.

**5.18 First Aid**

First-aid kits are available in the project office, at the safety center and other locations as indicated during orientation. In addition, foremen and superintendents maintain current first-aid and CPR cards.

CPR/First-Aid cards are on file in the Project Safety Office.

**5.19 Fire Protection**

ASKW-Davis, LLC maintains one or more fire extinguishers (rated not less than 2A) every 3000 square feet of building area, or every 100 feet. In multi-story buildings one or more fire extinguishers rated not less than 2A are provided on each floor and adjacent to the stairway(s). All trucks and equipment are fitted with portable fire extinguishers. Employees are instructed on the location and usage of these fire extinguishers. Emergency telephone numbers for fire protection and emergency medical services are posted on the field office bulletin board.

Fire Protection procedures are located in Tab 6 – EMERGENCY ACTION, EVACUATION and FIRE PREVENTION of this SSSP binder.

**5.20 Emergency Action Plan**

Each jobsite develops an emergency action plan that's reviewed with each employee during orientation. The emergency action plan covers emergency escape procedures, procedures followed by employees remaining to operate critical operations before they evacuate, procedures to account for all employees, rescue and medical duties, and how to report emergencies. Site maps showing site and building evacuation routes, assembly areas and other critical information will be posted on the employee bulletin board and other appropriate sites around the project. Maps, routes and assembly areas will be modified to reflect all physical changes as the project progresses.

Emergency Action Plan is located in Tab 6 – EMERGENCY ACTION, EVACUATION and FIRE PREVENTION of this SSSP binder.

**6.0 Safety Program and Policy Limitations**

The provisions in this policy reflect decisions made by management and are not required to be approved by employees. It's impossible to anticipate every circumstance or question about policy and include them all in this safety program and policy. Also, as time goes by, the need for revisions will arise and ASKW-Davis, LLC reserves the right to revise, supplement, or rescind any portion of this policy at its discretion at any time with or without notice.