



**SAFETY & HEALTH
PROGRAMS AND PROCEDURES
2024 REVISIONS**

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DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
POLICY & PROCEDURES REVISION SUMMARY SHEET

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DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
POLICY & PROCEDURE- SUMMARY OF POLICY STATEMENTS

1. SUMMARY OF POLICY STATEMENTS

SAFETY- "SUCCESS IS NO ACCIDENT"

Revision Date- 10/2/2024

SAFETY & HEALTH STATEMENT

Daniels and Daniels Construction Company is committed to promoting the welfare of every employee, within and outside our organization. Safety and health are paramount regardless of tenure, rank, experience, or position. In the construction industry, safe work methods are essential throughout all operations. Therefore, we will remain diligent in hazard recognition, controls, and elimination through proper training and education to provide the safest work environment possible. We will hold ourselves and those around us accountable to ensure the best possible workplace regarding safety and health.

GOAL

Daniels & Daniels' goal is to educate, promote, and encourage safety & health so that each employee ends their day in a better condition than they began.

MISSION

To create a culture of safety beyond compliance.

2. FALL PROTECTION PROGRAM - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

Daniels and Daniels require all personnel, including contractors, vendors, and visitors, to utilize fall protection when working at heights greater than 6 feet on any D&D project site or home office location. Fall protection systems must be used, installed, maintained, and stored per manufacturer requirements, OSHA EM 385 1-1 regulations, and as outlined in this policy. Personnel should be trained in the proper selection, use, and maintenance of fall protection systems, and this training must be documented. No tasks should be performed at heights above 6 feet without proper fall protection, regardless of trade or subpart. The D&D Safety and Health Director (SHD) maintains and revises this policy. If you have any questions, please direct them to the SHD.

3. LOCKOUT-TAGOUT (LOTO) - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

All personnel, including subcontractors, must strictly follow this LOTO procedure before working on or around hazardous energy sources. No person is allowed to work until it is verified that machinery or equipment is isolated, locked out, and tagged. Only trained and authorized personnel are permitted to perform LOTO procedures. All personnel must have the required PPE and devices for safe LOTO procedures. This policy can only be altered with SHD approval.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
POLICY & PROCEDURE- SUMMARY OF POLICY STATEMENTS

4. TRENCHING & EXCAVATION - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

All trenching and excavation (T&E) personnel must comply with CFR 29 1926 Subpart P and EM 385 Section 25. Personnel must be protected from T&E hazards, and all soils in the operational area are considered Type C. No T&E activities should commence until requirements are met and authorization is given by D&D supervision. Questions should be directed to the SHD. Only supervised and authorized personnel should engage in T&E activities.

5. CONFINED SPACE ENTRY - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

All confined space conditions are considered permit-required unless proven otherwise. If a permit-required confined space is identified, D&D will notify personnel of dangers through verbal communication and signs. Entry into permit spaces requires authorization, and all contractors must have a written program. The SHD is responsible for maintaining and revising this policy. Questions should be directed to the SHD.

6. HAZARD COMMUNICATION PROGRAM - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

Employees and subcontractors exposed to hazardous chemicals must be informed of the chemicals' properties and protective measures through labels, SDS, and training. Supervisors are responsible for maintaining hazardous chemical inventories and ensuring proper training. D&D will provide information about chemical hazards and control measures and assist in managing exposure incidents. Questions regarding this policy should be directed to the SHD.

7. PERSONAL PROTECTIVE EQUIPMENT (PPE) - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

Personnel should use the hierarchy of controls before relying on PPE. All personnel must use appropriate PPE; work should not begin until the required PPE is available. The SHD will identify, procure, and train personnel on using PPE. Questions regarding PPE should be directed to the SHD.

8. MEDICAL SERVICES & FIRST AID PROCEDURES - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

All D&D employees will assist injured or ill personnel on job sites, and emergency services will be summoned as necessary. Procedures outlined in this policy must be followed.

9. EMERGENCY ACTION PLAN (EAP) - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

Each D&D project site must develop and implement a site-specific EAP.

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POLICY & PROCEDURE- SUMMARY OF POLICY STATEMENTS

10. EMPLOYEE REPORT OF HAZARDS - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

All employees must report hazardous conditions immediately. These reports must be addressed without delay.

11. ACCIDENT REPORTING & INVESTIGATION PROCEDURES - POLICY & PROCEDURE

Revision Date: 9/24/2024

POLICY:

All accidents, incidents, and near-miss situations must be reported promptly and accurately. D&D employees should follow the procedures in this policy.

12. DAILY PROJECT REPORTING - POLICY & PROCEDURE

Revision Date: 9/25/2024

POLICY:

Daily reports must be completed accurately and promptly, per project specifications. This includes weekends and holidays for federal/military projects.

13. BLOODBORNE PATHOGEN PROGRAM (BBPP) - POLICY & PROCEDURE

Revision Date: 9/26/2024

POLICY:

Employees exposed to human blood or OPIM should follow the BBPP guidelines. Injured individuals should self-administer first aid whenever possible to minimize exposure to others.

14. WEEKLY SITE TOOLBOX MEETINGS - POLICY & PROCEDURE

Revision Date: 9/26/2024

POLICY:

Weekly toolbox meetings must be held on each project before the close of business on Wednesday. Personnel must follow this procedure.

15. PRECONSTRUCTION CONFERENCE (SAFETY) - POLICY & PROCEDURE

Revision Date: 9/26/2024

POLICY:

Pre-construction meetings must establish clear roles and responsibilities for safe project execution.

16. PRE-INSTALLATION MEETINGS (SAFETY) - POLICY & PROCEDURE

Revision Date: 9/26/2024

PURPOSE

Establish guidelines for Pre-installation (PRE-INSTALL) Meetings, also known as Preparatory Meetings. These meetings, held before starting any activity, are essential for reviewing the installation process, required materials and equipment, project specifics, site-specific concerns, and all safety-related matters.

17. FLEET SAFETY - POLICY & PROCEDURE

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
POLICY & PROCEDURE- SUMMARY OF POLICY STATEMENTS

Revision Date: 9/26/2024

Prohibited

Actions

Actions prohibited and may result in revocation of driving privileges:

- Distracted driving (e.g., using electronic devices, eating, grooming)
- Driving while impaired by alcohol, drugs, illness, or fatigue
- Reckless, aggressive, or retaliatory driving
- Failing to follow traffic laws and site-specific speed limits
- Not reporting incidents involving company vehicles
- Unauthorized passengers or use of company vehicles for personal profit
- Using radar detectors, towing without authorization, and transporting hazardous materials
- Improper cargo securing that violates OSHA, DOT, or other regulatory standards

Cell Phone Policy:

- No handheld device use while driving; hands-free devices are allowed
- Calls should go to voicemail if hands-free is not available
- No reading or responding to electronic messages while driving

18. COMPANY VEHICLE MAINTENANCE - POLICY & PROCEDURE

Revision Date: 9/27/2024

Maintenance Schedule

All company vehicles must be maintained per the manufacturer's guidelines, including:

- Oil change every 5,000 miles
- Tire rotation every 10,000 miles
- Alignments as needed
- Exterior/interior cleaning at least once a month

Vehicle Cleanliness

Drivers are responsible for maintaining the cleanliness of their vehicles, both interior and exterior, in accordance with D&D's professional image.

19. LOSS PREVENTION & ASSET PROCUREMENT - POLICY & PROCEDURE

Revision Date: 9/27/2024

POLICY

D&D employees are responsible for safeguarding company assets from loss, misuse, or abuse, regardless of position or job assignment.

20. RECORDKEEPING PROCEDURES

Revision Date- 9/27/2024

SEE FULL POLICY

The record-keeping procedure ensures compliance with legal and internal standards for D&D. Documents are categorized into training, safety, equipment, and project-related groups, with precise storage locations and retention timelines. Each document has designated responsibilities for creation, submission, and storage, emphasizing safety and compliance at all project stages.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
POLICY & PROCEDURE- SUMMARY OF POLICY STATEMENTS

21. DISCIPLINARY ACTION FOR VIOLATION & FAILURE TO REPORT (EMPLOYEE)

Revision Date: 9/27/2024

Disciplinary Procedure

Violations will follow these steps:

- 1st Violation: Written warning and discussion with supervisor
- 2nd Violation: Written warning and meeting with Safety and Health Director (SHD) and supervisor
- 3rd Violation: Written warning, meeting with SHD, President, and VP, followed by a 90-day probation

90-Day Probation

Further violations during probation will result in immediate termination.

22. SAFETY INSPECTIONS - D&D EMPLOYEES

Revision Date: 9/27/2024

Inspection Frequency

Superintendents must conduct safety inspections at key intervals throughout the day. PMs should perform safety inspections during site visits concurrent with other inspections.

23. FIRE PREVENTION AND CONTROL - POLICY & PROCEDURE

Revision Date: 9/27/2024

POLICY

A fire protection plan must be in place from the start of construction and integrated into the overall project safety program.

24. WORKPLACE VIOLENCE – POLICY

Revision Date: 9/27/2024

POLICY

Violent behavior or threats are prohibited at all D&D locations and events. Violations will result in disciplinary action up to and including termination and may involve criminal prosecution. Retaliation against individuals who report such behavior is also prohibited.

25. LASER SAFETY - POLICY & PROCEDURE

Revision Date: 10/2/2024

POLICY

D&D is committed to ensuring the safe use of lasers on job sites by adhering to all regulatory and manufacturer requirements. Laser equipment must be regularly inspected, maintained, and calibrated to ensure safety and accuracy.

26. TOOL & EQUIPMENT OPERATION POLICY & PROCEDURE

Revision Date- 10/2/2024

POLICY

All personnel required to operate T&E must undergo training on proper and safe use. Only trained and authorized personnel may operate T&E. All operators must review and adhere to the T&E manufacturers' O&M guidelines.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
SAFETY & HEALTH STATEMENT

SAFETY- "SUCCESS IS NO ACCIDENT"

Revision Date 8/18/2023

SAFETY & HEALTH STATEMENT

Daniels and Daniels Construction Company is committed to promoting the welfare of every employee, within and outside our organization. Safety and health are paramount regardless of tenure, rank, experience, or position. In the construction industry, safe work methods are essential throughout all operations. Therefore, we will remain diligent in hazard recognition, controls, and elimination through proper training and education to provide the safest work environment possible. We will hold ourselves and those around us accountable to ensure the best possible workplace regarding safety and health.

GOAL

Daniels & Daniels' goal is to educate, promote, and encourage safety & health so that each employee ends their day in a better condition than they began.

MISSION

To create a culture of safety beyond compliance.

Jeremiah Daniels- President

"Success is no Accident."

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FALL PROTECTION PROGRAM- POLICY & PROCEDURE

FALL PROTECTION PROGRAM- POLICY & PROCEDURE

Revision Date- 9/23/2024

ACRONYMS

AHA – Activity Hazard Analysis
CFR – Code of Federal Regulations
D&D – Daniels & Daniels
EM – Engineer Manual
MEWP – Mobile Elevated Work Platform
OSHA – Occupational Safety and Health Administration
PFAS – Personal Fall Arrest Systems
PFPE – Personal Fall Protection Equipment
SHD – Safety and Health Director
SRL – Self-Retracting Lifeline

A. PURPOSE

This policy outlines the fall protection requirements for Daniels & Daniels (D&D) employees, contractors, vendors, and visitors working at heights greater than six feet above lower levels. It ensures compliance with safety regulations to prevent fall-related injuries and fatalities.

B. POLICY

D&D mandates that all personnel, including contractors and visitors, use fall protection systems when working at heights exceeding six feet on any D&D project site or office location. All fall protection systems must adhere to manufacturer requirements, OSHA, and EM 385 1-1 regulations.

Personnel must complete training on selecting, using, and maintaining fall protection equipment, with documentation available upon request. This policy applies regardless of task duration and supersedes OSHA's minimum height requirements. Any changes to this policy require the approval of the Safety and Health Director (SHD), who oversees fall protection procedures.

C. EXCEPTIONS

Contact the SHD for approval; consultation is always required to approve any exception.

Pre- and Post-Construction Inspections: Inspection access above six feet may be permitted under specific conditions:

- No built-in safety system is present.
- Inspections are limited to documentation or photography.
- Surfaces must support at least twice the intended load.
- Restrictions apply to roof pitch and surface obstacles.
- An Activity Hazard Analysis (AHA) is needed for EM-385 projects.

Scaffolding:

According to 1926.451(g)(2), a competent person must assess the feasibility of fall protection during scaffold erection or dismantling. Fall protection should be provided where feasible, and the competent person overseeing scaffolding is responsible for ensuring this.

D. APPLICABILITY

This policy applies to all D&D employees, contractors, vendors, and visitors performing tasks or

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FALL PROTECTION PROGRAM- POLICY & PROCEDURE

inspections at heights greater than six feet. If external personnel have a stricter fall protection policy, that policy will take precedence for their workers when requested.

E. REFERENCES

- 29 CFR 1910 (General Industry, Subpart F)
- 29 CFR 1926 (Construction Industry, Subparts E, L, M)
- EM 385-1-1, Section 21 (Fall Protection)
- ANSI 359.2-2017
- OSHA 3146-05R 2015 (Fall Protection in Construction)

F. FALL PROTECTION PROGRAM COMPONENTS

Personnel must receive fall protection training before initial assignments. Key elements of the D&D Fall Protection Program include:

- Fall hazard identification and trigger heights.
- Hierarchy of fall protection
- Proper selection, inspection, and maintenance of systems
- Rescue procedures
- Regular training

G. IDENTIFICATION OF FALLS AND TRIGGER HEIGHTS

Falls are the leading cause of construction fatalities. Employees working above six feet must use guardrails, safety nets, or personal fall arrest systems (PFAS). Situations requiring fall protection include unprotected sides, edges, leading edges, hoist areas, holes, formwork, roofing, excavations, and precast concrete erection.

H. HIERARCHY OF FALL PROTECTION

D&D follows a structured approach to mitigate fall hazards:

- **Hazard Elimination:** Remove the need to work at heights.
- **Passive Fall Protection:** Use guardrails or covers.
- **Fall Restraint Systems:** Prevent access to fall hazards.
- **Fall Arrest Systems:** Arrest falls once it occurs.
- **Administrative Controls:** The least preferred option is to rely on awareness and procedures.

A fall hazard survey must be conducted before work begins to identify the appropriate fall protection method. Fall restraint systems are always preferred over fall arrest systems.

I. Fall Protection System Use

1. Selection:

D&D consults qualified professionals, including manufacturer representatives, to select fall protection systems. It prefers sourcing components from a single manufacturer. Accepted systems include guardrails, safety nets, hole covers, and fall restraint or arrest systems.

2. Inspection:

A competent person must inspect Fall protection systems daily, and personal fall protection equipment (PFPE), like harnesses and lanyards, should be inspected before each use.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FALL PROTECTION PROGRAM- POLICY & PROCEDURE

3. Use, Installation, and Maintenance:

PFAS and other systems must comply with 29 CFR 1926, Subpart M, and be installed and maintained according to OSHA and manufacturer guidelines.

4. Installation:

All systems must be installed following manufacturer and regulatory guidelines. Materials must be inspected for defects before use, and any defective materials must be discarded.

5. Limitations:

Personnel must know system limitations, including weight capacity, fall clearance, swing fall risks, and connection compatibility.

6. Storage:

Fall protection equipment should be stored in clean, dry environments away from tools and materials to avoid accidental damage.

J. AERIAL WORK PLATFORMS & SCISSOR LIFTS

Personnel using aerial work platforms and scissor lifts must use personal fall protection equipment (PFPE) to prevent ejection from the platform. Tethering or restraint systems are required while self-retracting lifelines (SRL) should only be used if the manufacturer permits.

K. RESCUE PROCEDURES

D&D personnel are equipped with suspension trauma relief straps for self-rescue. Rescues should be performed using mobile elevated work platforms (MEWPs) or ladders, with site-specific rescue plans developed as needed based on fall height, clearance, and available resources.

L. NEAR-MISS REPORTING

All near-miss incidents must be immediately reported to project staff and the SHD for investigation and corrective action.

M. ROLES AND RESPONSIBILITIES

Safety & health director:

- Oversee the implementation and revision of the Fall Protection Policy.
- Address inquiries related to fall protection systems and training.
- Approve any exceptions to the policy.

Supervisors:

- Ensure that personnel are trained in fall protection requirements.
- Conduct fall hazard surveys and identify necessary protective measures.
- Monitor compliance with fall protection practices on-site.

Competent persons:

- Inspect fall protection systems daily and personal fall protection equipment before use.
- Ensure proper installation and maintenance of fall protection systems.
- Conduct site-specific rescue planning.

Employees:

- Use fall protection systems as required and participate in training.
- Report near-miss incidents and any unsafe conditions to supervisors.

Contractors/vendors/visitors:

- Comply with the D&D Fall Protection Policy and any additional safety requirements.
- Participate in site-specific training when applicable.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FALL PROTECTION PROGRAM- POLICY & PROCEDURE

By clearly defining these roles, D&D aims to ensure accountability and promote a safe working environment for all personnel involved.

SUMMARY

The D&D Fall Protection Policy establishes comprehensive requirements for employees, contractors, vendors, and visitors regarding using fall protection systems at heights exceeding six feet. The primary objective is to ensure the safety of all personnel by mandating compliance with OSHA regulations, manufacturer guidelines, and best practices in fall protection.

Policy highlights for program compliance:

1. **Universal Requirement:** All personnel must use fall protection systems at heights greater than six feet, with no exceptions based on trade or task duration.
2. **Training:** All personnel must be trained in the selection, use, and maintenance of fall protection systems before assignments involving height exposure.
3. **System Selection:** Whenever possible, fall protection equipment will be sourced from a single manufacturer based on a thorough fall hazard survey.
4. **Daily Inspections:** A competent person must inspect Conventional fall protection systems daily, while personal fall protection equipment should be inspected before each use.
5. **Hierarchy of Fall Protection:** The policy emphasizes a hierarchy of controls to prioritize safety measures, from hazard elimination to administrative controls.
6. **Rescue Plans:** Site-specific rescue plans must be developed to address unique project characteristics and ensure the capability for timely rescues.
7. **Reporting:** Immediate reporting of near-miss incidents is required to facilitate investigation and corrective action.

By adhering to this policy, D&D aims to foster a safety culture, reduce fall-related incidents, and comply with all regulatory requirements, thereby safeguarding the well-being of all personnel on-site.

END SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
LOCKOUT-TAGOUT – HAZARDOUS ENERGY CONTROL- POLICY & PROCEDURE

LOCKOUT-TAGOUT – HAZARDOUS ENERGY CONTROL- POLICY & PROCEDURE
Revision Date- 9/24/2024

ACRONYMS

AHA- Activity Hazard Analysis
CAZ- Controlled Access Zone
D&D- Daniels and Daniels
HECP- Hazardous Energy Control Program
LOTO- Lockout/Tagout
PM- Project Manager
P&P- Policy & Procedure
PPE- Personal Protective Equipment
SHD- Safety & Health Director
SPE- Specialty Protective Equipment

A. PURPOSE

The Lockout/Tagout (LOTO) program establishes a system for locking out and tagging energy-isolating devices to protect personnel from unexpected energization, machine startup, or release of stored energy that could cause injury. Before servicing, repair, or maintenance, machines or equipment must be isolated from all hazardous energy and locked/tagged out.

The Safety & Health Director (SHD) maintains and revises this policy. If you have questions about hazardous energy control or this procedure, please direct them to the SHD.

B. POLICY

This procedure must be followed before working on or around hazardous energy sources. All personnel, including subcontractors, must verify that machines are stopped, isolated from hazardous energy, and locked/tagged out before commencing work.

All personnel must have the necessary Personal Protective Equipment (PPE) and devices to perform LOTO safely. ONLY TRAINED AND AUTHORIZED PERSONNEL MAY PERFORM LOTO PROCEDURES. IF YOU DON'T KNOW, LEAVE IT ALONE! This policy cannot be altered without SHD approval.

C. APPLICABILITY

This Policy and procedure (P&P) applies to all D&D employees, contractors, vendors, or visitors involved in work processes or tasks requiring inspection, servicing, or maintenance of machines or equipment that could store hazardous energy.

This P&P applies to all tasks and inspections, regardless of duration, and serves as the governing document for LOTO requirements on all D&D project sites and home office locations, with the following exceptions: a contractor, vendor, or visitor may use their company LOTO policy, that policy takes precedence for their personnel. If an external governing entity requests adherence to its LOTO policy, that policy takes precedence.

D. REFERENCES

29 CFR 1910.269—Electric Power Generation, Transmission, and Distribution
29 CFR 1910.332-335—Electrical
29 CFR 1910.147—Control of Hazardous Energy
EM-385 1-1, Section 12—Control of Hazardous Energy

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
LOCKOUT-TAGOUT – HAZARDOUS ENERGY CONTROL- POLICY & PROCEDURE

E. WHAT IS HAZARDOUS ENERGY?

Hazardous energy includes mechanical, pneumatic, hydraulic, electrical, chemical, nuclear, and thermal energies that could injure employees.

F. ENERGY ISOLATING DEVICES

Employees must be trained on the survey conducted to identify machinery and equipment with potentially hazardous energy. This survey identifies energy-isolating devices that must be locked or tagged for safety during servicing or maintenance. Information is recorded on Form A, maintained in the respective department, and readily available.

G. SEQUENCE OF LOCKOUT/TAGOUT PROCEDURES

Note: Residual energy must be dissipated or restrained (e.g., grounding, repositioning) before LOTO.

1. **Step One:** Notify affected employees of LOTO implementation and complete Form A for the respective machine or equipment.
2. **Step Two:** Shut down the machine or equipment according to standard procedures.
3. **Step Three:** Locate and deactivate each energy-isolating device to isolate the machinery from energy sources (refer to Form A).
4. **Step Four:** Lock out devices that store hazardous energy and ensure residual power is restrained or dissipated.
5. **Step Five:** Lock or tag each energy-isolating device with assigned locks/tags. If using a tag instead of a lock, complete a tagout justification.
6. **Step Six:** Verify that personnel are not exposed. Attempt to start the equipment to ensure LOTO is effective. Return controls to “neutral” or “off.”

H. TAGOUT JUSTIFICATION SYSTEM

If circumstances prevent full LOTO and only Tagout is used, meet the following criteria:

Requirement One:

- Confirm that the Tagout system provides complete employee protection.
- Tagout devices placed where locks would be.
- The Tagout system offers a safety equivalent to the lockout program.
- Additional safety measures must be documented, including isolating circuit elements, blocked control switches, etc.

Tagout Device Standards:

- Singularly identified and used only for controlling energy.
- Durable, substantial, and nonreusable.
- Employee identity must be indicated, and warnings must be included against hazardous conditions.

Training: Employees must understand:

- Tags are warning devices, not physical restraints.
- Tags must never be removed without authorization.

Requirement Two: Document the following on the “Tagout Only” form:

- Specific reasons for using the Tagout system.
- How equivalent protection was obtained.
- Training details provided to affected employees (location, date, trainer's name).

I. PROCEDURE FOR RESTORING MACHINES OR EQUIPMENT TO NORMAL OPERATION

Upon completing servicing, the authorized employee must ensure:

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
LOCKOUT-TAGOUT – HAZARDOUS ENERGY CONTROL- POLICY & PROCEDURE

- No one is exposed to machinery.
- All tools and materials are removed.
- All guards and protective covers are reinstalled.
- No exposed electrical wires remain.
- The authorized person confirms it is safe for startup.

If the authorized person is present, they may remove LOTO devices. If absent, devices can only be removed under a supervisor's direction and documented on the "Unavailable Authorized Person" form.

Note: For multiple authorized persons, the designated coordinator will have each person sign before withdrawing their device.

J. TEMPORARY REMOVAL OF LOTO DEVICES

When testing or repositioning requires temporary removal of LOTO devices:

- Follow steps one through three of the LOTO sequence.
- Conduct tests or reposition equipment.
- Reapply energy control measures per this P&P.

K. OUTSIDE CONTRACTORS & ORGANIZATIONS

When outside contractors perform maintenance on hazardous energy-containing equipment, they should follow this P&P or their own LOTO program if it meets or exceeds D&D standards.

L. GROUP LOTO

For group LOTO, a D&D project team member will serve as the "group coordinator." Each authorized person must:

- Place their lockout/tagout device on the isolating devices.
- Sign in their name, job title, date, and time of affixing/removing devices.

M. ROLES AND RESPONSIBILITIES

1. Safety & Health Director (SHD):

Maintain and revise the LOTO program, ensure employee training, conduct audits, and address any LOTO-related issues or deviations.

2. Project Managers (PM):

Implement LOTO on all projects, coordinate training, and ensure subcontractors' compliance.

3. Supervisors:

Ensure LOTO procedures are followed, designate authorized employees, verify energy isolation, and communicate with all involved personnel.

4. Authorized Employees:

Perform LOTO, isolate energy sources, apply devices properly, and notify affected employees.

5. Affected Employees:

Follow LOTO instructions and never attempt to operate locked/tagged equipment.

6. Subcontractors, Contractors, Vendors, and Visitors:

Comply with the D&D policy or their own LOTO policy and ensure employee training.

7. Group Coordinator (Group LOTO):

Oversee group LOTO, ensuring proper lock/tag application and recordkeeping.

SUMMARY

Purpose:

This program prevents injuries by controlling hazardous energy during equipment servicing or

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
LOCKOUT-TAGOUT – HAZARDOUS ENERGY CONTROL- POLICY & PROCEDURE

maintenance. Machines must be locked and tagged to avoid accidental start-up or energy release.

Applicability:

This policy applies to **all D&D employees, contractors, and visitors** working with hazardous energy. Contractors may follow their LOTO policy if it meets or exceeds the D&D standards.

Key Requirements:

- 1. Authorization & Training:** Only trained and authorized personnel can perform LOTO.
- 2. Energy Isolation:** Identify and isolate all energy sources using proper energy-isolating devices (IEDs) before work begins.
- 3. LOTO Sequence:** Notify affected personnel, shut down equipment, isolate energy, apply lockout/tagout devices, and verify effectiveness.
- 4. Tagout Justification:** If locks aren't used, equivalent safety measures must be implemented.
- 5. Restoration:** Before removing LOTO devices, ensure all tools are removed, guards are in place, and no personnel are exposed.
- 6. Group LOTO:** A coordinator will manage group LOTO, ensuring all participants apply their lock or tag.
- 7. Outside Contractors:** They must comply with the D&D policy or their policy

Roles and Responsibilities:

- **SHD:** Manages and revises the LOTO program.
- **PMs/Supervisors:** Implement and oversee LOTO on projects.
- **Authorized Employees:** Execute LOTO procedures.
- **Affected Employees:** Do not operate locked/tagged-out equipment.

References & Forms:

- OSHA 29 CFR 1910.147—Control of Hazardous Energy.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
TRENCHING & EXCAVATION- POLICY & PROCEDURE

TRENCHING & EXCAVATION- POLICY & PROCEDURE

Revision Date- 9/24/2024

ACRONYMS

AHA- Activity Hazard Analysis

CFR- Code of Federal Regulations

D&D- Daniels and Daniels

PM- Project Manager

P&P- Policy & Procedure

PPE- Personal Protective Equipment

SHD- Safety & Health Director

T&E- Trenching & Excavation

A. PURPOSE

This procedure establishes the requirements for all D&D employees, contractors, visitors, and vendors engaged in or exposed to trenching and excavation (T&E) activities. It aims to protect personnel from hazards associated with T&E operations by ensuring compliance with relevant safety standards.

B. APPLICABILITY

This Policy & Procedure (P&P) applies to all D&D personnel and associated parties involved in any tasks requiring engagement in or exposure to T&E activities, regardless of duration. It serves as the governing document for T&E requirements on all D&D project sites and home office locations, with the following exceptions:

- If a contractor, vendor, or visitor has their own T&E policy, their policy takes precedence for their personnel.
- If an external governing entity requests adherence to their T&E policy, that policy takes precedence.

C. DEFINITIONS

- **Excavation:** Any man-made cut, cavity, trench, or depression in the earth's surface formed by earth removal.
- **Trench:** A narrow excavation (in relation to its length) made below the ground's surface. The depth is greater than the width, and the width at the bottom is not greater than 15 feet.
- **Competent Person:** An individual capable of identifying existing and predictable hazards in the surroundings or working conditions and authorized to take prompt corrective measures to eliminate them.

D. POLICY

All personnel involved in T&E activities must:

- Comply with OSHA CFR 29 1926 Subpart P—Excavation requirements and EM 385 Section 25 Excavation & Trenching (if applicable).
- Be supervised by a competent person experienced in T&E requirements.
- Treat all soils in the operational area as Type C due to regional soil conditions.
- Not commence any T&E activities until all requirements outlined in this P&P are met and authorization is granted by D&D project supervision.
- Use necessary Personal Protective Equipment (PPE) appropriate for the hazards.
- Only trained and authorized personnel may engage in T&E activities. **IF YOU DON'T KNOW, LEAVE IT ALONE!**

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Any questions regarding T&E or this P&P should be directed to the D&D Safety & Health Director (SHD). This policy may only be altered with SHD approval.

E. REFERENCES

- **CFR 29 1926 Subpart P – Excavations**
- **EM 385 1-1 Section 25 – Excavations & Trenching** (if applicable)
- **OSHA Standards and Appendices** for detailed specifications on protective systems

F. HAZARD IDENTIFICATION

Common hazards:

- **Cave-ins:** Leading cause of fatalities in T&E activities.
- **Slips, Trips, and Falls:** From elevations or equipment.
- **Struck-by/Crushed-by Hazards:** Falling loads, equipment, materials, or soil.
- **Hazardous Atmospheres:** Oxygen deficiency or presence of toxic gases.
- **Water Accumulation:** Flooding risks.
- **Underground Utilities:** Electrical shocks, gas explosions, water ingress.
- **Overhead Power Lines:** Electrocution risks.
- **Vehicular Traffic:** Struck-by incidents from moving vehicles or equipment.

G. HAZARD CONTROLS AND SAFE WORK PRACTICES

Before performing any T&E work:

- 1. Locate Underground Utilities:**
 - Use the national "Call Before You Dig" hotline (811) or a private locating service.
 - Be aware that utility markings may be inaccurate by 2-3 feet.
- 2. Hand Dig Near Utilities:**
 - Use hand tools or soft digging techniques to expose existing utilities.
- 3. Survey the Site:**
 - Determine the appropriate protective systems considering soil type, depth, adjacent structures, utilities, surface conditions, traffic exposure, and water table.
- 4. Implement Protective Systems:**
 - Use protective systems for trenches deeper than 5 feet unless a competent person deems them unnecessary for shallower trenches.
 - Protective systems over 20 feet deep must be designed by a registered professional engineer.
- 5. Maintain Safe Spoil Pile Distance:**
 - Keep spoil piles and stored materials at least 2 feet from the trench edge.
- 6. Use Warning Systems for Equipment:**
 - When operating equipment near trenches, use barricades, signals, or stop logs to prevent accidental entry.
- 7. Provide Safe Access and Egress:**
 - For trenches over 4 feet deep, provide ladders, ramps, or stairways within 25 feet of lateral travel.
- 8. Monitor for Hazardous Atmospheres:**
 - Test for oxygen deficiency or toxic gases in trenches over 4 feet deep where such hazards may exist.
- 9. Control Water Accumulation:**
 - Do not work in trenches with accumulating water unless protective measures are in place (e.g., pumps, well-point systems).
- 10. Use Appropriate PPE:**
 - Provide and use necessary PPE, including high-visibility garments, when exposed to vehicular traffic.

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H. PROTECTIVE SYSTEMS

Types of Protective Systems:

1. Sloping and Benching:

- Cutting back trench walls at an angle inclined away from the excavation.
- Must follow specifications based on soil type (assumed Type C in D&D operations).

2. Shoring:

- Using supports to prevent soil movement and cave-ins.
- Includes metal hydraulic, mechanical, or timber shoring.

3. Shielding (Trench Boxes):

- Using trench boxes to protect workers from cave-ins.
- Shields must be certified by a registered professional engineer.

Exceptions

Protective systems are not required if:

- Excavations are made entirely in stable rock.
- Excavations are less than 5 feet deep and evaluated as safe by a competent person.

I. INSPECTIONS

The competent person must inspect excavations, adjacent areas, and protective systems:

- Daily and before each shift.
- After any event that could increase hazards (e.g., rainstorms).
- Document all inspections on the daily report.
- Remove employees from hazardous areas until safety is ensured if any risks are identified.

J. PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mandatory PPE includes:

- Hard hat
- Safety glasses
- Work boots
- Long pants
- Shirt with minimum 6-inch sleeves
- High-visibility garment

Additional PPE may be required based on specific hazards (e.g., gloves, goggles, and respiratory protection). For details, refer to the D&D PPE Policy & Procedure.

K. EXCAVATION SAFETY PLAN

An excavation safety plan must be developed and communicated to all personnel involved in T&E activities. Key components include:

- Use of the local one-call system to locate underground utilities.
- Assessment of confined space and atmospheric hazards.
- Selection of appropriate protective systems and PPE.
- Soil composition and classification analysis.
- Planning for water accumulation management.
- Determining trench depth and duration considerations.
- Compliance with OSHA standards and D&D policies.

L. SAFETY PRECAUTIONS FOR PROTECTIVE SYSTEMS

Sloping and benching

- Follow OSHA CFR 29 1926 Subpart P Appendix B for specifications.

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- For excavations 5 to 20 feet deep, systems must be constructed under a competent person's guidance.
- Excavations over 20 feet require a design by a registered professional engineer.

Shoring systems

- Refer to OSHA Standard Appendices C, D, and E for shoring details.
- Must be installed as per engineered designs.

Shield systems (trench boxes)

- Must be certified by a registered professional engineer.
- Repairs or modifications require manufacturer approval.
- Safety measures include:
 - No lateral movement of shields when installed.
 - Protection during entry and exit (e.g., ladders, sloped ramps).
 - Prohibition of personnel in shields during installation or removal.
 - Shields extending at least 18 inches above the surrounding area where sloping begins.
 - Protection of open ends with sloping, shoring, or end plates.

M. ROLES AND RESPONSIBILITIES

1. Safety and Health Director (SHD)

- Oversee T&E policy development and implementation.
- Ensure training on T&E safety protocols.
- Approve modifications to policies.

2. Project Supervisor

- Ensure compliance with T&E procedures.
- Authorize the start of T&E activities after safety checks.
- Facilitate communication on T&E safety.

3. Competent Person

- Conduct daily inspections and identify hazards.
- Classify soil types and determine protective systems.
- Document inspections and findings.

4. Workers

- Follow T&E safety policies and wear required PPE.
- Report hazards to the competent person.
- Participate in safety training.

5. Contractors and Subcontractors

- Comply with the D&D T&E policy or their company policy.
- Ensure personnel are trained and supervised.

6. Visitors and Vendors

- Adhere to T&E safety policies on site.
- Be aware of T&E activities and hazards.

SUMMARY AND BEST PRACTICES

1. Avoid Unprotected Trenches:

- Never enter a trench without proper protective measures and a safety analysis.

2. Use Appropriate Safety Systems:

- Implement sloping, shoring, or shielding as required.

3. Ensure Safe Entry and Exit:

- Provide marked and easily accessible entry and exit points.

4. Regular Inspections:

- Conduct inspections at the start of each shift and after events like rainstorms.

5. Competent Person Oversight:

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- A competent person must inspect trenches and address hazards immediately.
- 6. Additional Safety Measures:**
 - Keep heavy equipment away from trench edges.
 - Identify and mark underground utilities.
 - Test for hazardous atmospheres.
 - Do not work under raised loads.
 - Maintain surcharge loads at least 2 feet from trench edges.
- 7. Atmospheric Testing:**
 - Ensure safe oxygen levels and the absence of hazardous gases per OSHA guidelines.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
CONFINED SPACE ENTRY- POLICY & PROCEDURE

CONFINED SPACE ENTRY- POLICY & PROCEDURE

Revision Date: 9/24/2024

ACRONYMS

CFR - Code of Federal Regulations

D&D - Daniels and Daniels Construction Company

LOTO - Lockout/Tagout

P&P - Policy and Procedure

PPE - Personal Protective Equipment

SDS - Safety Data Sheet

SHD - Safety & Health Director

A. PURPOSE

This policy and procedure (P&P) outlines the requirements for protecting employees and contractors working in confined space conditions on Daniels and Daniels Construction Company (D&D) projects. It establishes safe entry methods before and during all work activities in confined spaces.

B. POLICY

D&D mandates that all employees, vendors, visitors, and contractors entering or inspecting a confined space must utilize and maintain the necessary confined space equipment. Only trained personnel should perform confined space activities.

Key Points:

- All confined space conditions are considered permit-required until pre-entry procedures prove otherwise.
- If a permit-required confined space is identified, D&D will notify exposed individuals about its existence, location, and associated dangers through verbal communication and signage.
- Entry into a permit space requires authorization. All contractors must implement a written permit space program on-site and ensure accessibility before and during entry operations.

Responsibilities:

- The Safety & Health Director (SHD) maintains and revises this policy. Questions regarding confined space work should be directed to the SHD, and any changes must be approved.

C. APPLICABILITY

This program applies to all D&D employees, contractors, or vendors involved in confined space work on any D&D project. The governing document for confined space requirements is subject to the following exceptions:

- If a contractor, vendor, or visitor has their own policy, that policy takes precedence.
- If a governing entity or property manager has a policy, that policy will apply if requested.

D. DEFINITIONS

- **Confined Space:** A space large enough for a person to enter, with limited or restricted means of entry and exit, and not designed for continuous occupancy.
- **Permit-Required Confined Space:** A confined space with potential atmospheric hazards, engulfment risks, configuration hazards, or recognized safety/health hazards.

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CONFINED SPACE ENTRY- POLICY & PROCEDURE

- **Non-Permit Confined Space:** A confined space that does not meet the criteria for a permit-required confined space.

E. PERMIT SPACE ENTRY COMMUNICATION & COORDINATION

Before commencing work in areas with existing permit spaces, D&D should obtain and share the following information with all personnel involved in the entry:

- Locations of known permit spaces.
- Associated hazards and precautions previously implemented.

After operations, D&D will debrief entry contractors on hazards encountered and document this information for future reference.

F. PERMIT-REQUIRED CONFINED SPACE PROGRAM

Before working in a permit space, D&D must coordinate safety and compliance with all contractors involved. The following measures should be implemented:

1. Prevent Unauthorized Entry:

- Post appropriate signage (e.g., “DANGER CONFINED SPACE AUTHORIZED PERSONNEL ONLY”).
- Barricade or cover entry points when unoccupied.

2. Hazard Identification and Evaluation:

- Assess physical hazards (moving equipment, engulfment risks, etc.) and atmospheric hazards (oxygen levels, combustible gases, etc.) before entry.

3. Hazard Elimination or Isolation:

- Implement barriers, lockout/tagout procedures, and ventilation to manage identified hazards.

4. Monitoring Procedures:

- Continuously monitor atmospheric conditions to ensure safety.

5. External Hazard Protection:

- Protect contractors with barriers and signage from external hazards (e.g., vehicle traffic).

6. Entry Conditions Verification:

- Confirm acceptable conditions and adequacy of PPE before entry.

7. Equipment Provisioning:

- Ensure testing devices, ventilation, communication tools, PPE, and rescue equipment are available.

8. Entry Evaluation and Monitoring:

- Evaluate and continuously monitor conditions during operations.

9. Contractor Coordination:

- Conduct pre-entry meetings to discuss contractors, activities, associated hazards, and agreed-upon procedures.

10. Permit Closure Procedures:

- Notify the D&D superintendent upon completion, account for all entrants, inspect the area, secure the space, cancel the permit, and retain documentation for at least one year.

11. Annual Review and Updates:

- Review and revise the permit space program annually based on feedback and canceled permits.

12. Entry Permit Requirements:

- The entry permit must include detailed information on the location, purpose, hazards, monitoring processes, personnel, and safety measures.

G. DUTIES & RESPONSIBILITIES

1. Authorized Entrants

- Familiarize themselves with hazards, operate equipment, communicate with attendants, and promptly evacuate under certain conditions.

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CONFINED SPACE ENTRY- POLICY & PROCEDURE

2. Attendant

- Monitor entrant safety, maintain an accurate entrant roster, assess conditions, and manage evacuations as necessary.

3. Entry Supervisor

- Verify permits, manage entries, ensure compliance, and remove unauthorized personnel.

4. Rescue and Emergency Services

- Assess available emergency services, ensure trained personnel for in-house rescue, and practice rescues annually.

5. Employee Participation

- Engage employees and authorized supervisors in developing and implementing the permit space program.

H. REFERENCES

- **29 CFR 1926** Construction Industry Regulations, Subpart AA - Confined Spaces in Construction
- **1910 OSHA Standards**, Subpart J - General Environmental Controls
- **EM 385-1-1**, Section 34 - Confined Space Entry

I. ROLES AND RESPONSIBILITIES

1. Safety and Health Director

- Maintain and revise the Permit-Required Confined Space Program to ensure compliance and safety.
- Ensure adequate training for all personnel involved in confined space operations.
- Address questions and communicate changes regarding confined space policies.

2. Project Manager

- Oversee project execution and ensure adherence to safety protocols during confined space work.
- Facilitate communication between contractors, supervisors, and the SHD.
- Ensure that necessary resources and support are available for safe entry operations.

3. Supervisors

- Before endorsing the permit, verify that all entries on it are complete and that the required tests and equipment are in place.
- Manage entry operations, including terminating or suspending entry as necessary.
- Ensure compliance with safety conditions and maintain accountability for all personnel in the confined space.

4. Contractors

- Adhere to the confined space program and ensure all personnel are informed of hazards and procedures.
- Engage employees in the development and implementation of the permit space program.
- Maintain documentation of entry permits and any incidents that occur during confined space operations.

SUMMARY

The **Permit-Required Confined Space Program** at Daniels and Daniels Construction Company (D&D) is designed to ensure the safety of employees, contractors, and visitors working in confined space environments. The program outlines policies, procedures, and responsibilities for identifying, assessing, and managing hazards associated with confined spaces. Key components include:

- **Purpose and Applicability:** This policy establishes requirements for safe entry and work practices in confined spaces across all D&D projects, applying to all personnel involved.
- **Permit Requirements:** Defines the process for obtaining and managing entry permits, including monitoring, hazard evaluation, and communication protocols.

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CONFINED SPACE ENTRY- POLICY & PROCEDURE

- **Duties and Responsibilities:** This section details the roles and duties of authorized entrants, attendants, and entry supervisors, ensuring that all personnel have the knowledge and tools to perform safely.
- **Emergency Preparedness:** Outlines procedures for summoning emergency services and conducting in-house rescues, emphasizing the need for training and readiness.
- **Continuous Improvement:** Emphasizes employee participation and annual reviews to enhance safety measures and address any identified deficiencies.

All confined spaces are considered permit-required until proven otherwise, promoting a culture of safety and compliance throughout D&D projects.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
HAZARDOUS COMMUNICATION PROGRAM- POLICY & PROCEDURE

HAZARDOUS COMMUNICATION PROGRAM- POLICY & PROCEDURE

Revision Date- 9/24/2024

ACRONYMS

AHA – Activity Hazard Analysis

ACIH – American Conference of Industrial Hygienists

CFR – Code of Federal Regulations

D&D – Daniels & Daniels Construction

GHS – Globally Harmonized System (of Classification and Labeling of Chemicals)

HAZCOM – Hazard Communication

OSHA – Occupational Safety and Health Administration

PEL – Permissible Exposure Limit

PPE – Personal Protective Equipment

SDS – Safety Data Sheet

SHD – Safety & Health Director

TLV – Threshold Limit Value

A. PURPOSE

To establish the requirements for Daniels & Daniels Construction (D&D) employees and subcontractors to comply with OSHA's Hazard Communication Standard (29 CFR 1910.1200) and to safeguard the health and safety of personnel exposed to hazardous chemicals.

B. POLICY

D&D requires that all employees and subcontractors exposed to or managing hazardous chemicals be informed about their hazardous properties and the protective measures available.

This is achieved through:

- Labels on chemical containers.
- Safety Data Sheets (SDS).
- Training before exposure and when hazards change.
- Work involving hazardous chemicals requires the use of proper personal protective equipment (PPE), along with training in its use and limitations.

D&D is committed to preventing injury or illness due to hazardous chemical exposure and complies with all relevant health and safety standards. This written program will be accessible electronically to all employees.

C. APPLICABILITY

This policy applies to all D&D work operations, including project sites and office locations, where personnel may be exposed to hazardous substances.

Exceptions include:

- Contractors or vendors with hazardous communication (HAZCOM) policies will take precedence for their personnel.
- When a governing entity (e.g., property owner) requests that their HAZCOM policy be followed, that policy will take precedence.

D. REFERENCES

- OSHA Hazard Communication Standard: 29 CFR 1910.1200
- OSHA Construction Regulations: 29 CFR 1926
- EM 385-1-1, Section 6: Hazardous or Toxic Agents

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
HAZARDOUS COMMUNICATION PROGRAM- POLICY & PROCEDURE

E. HAZCOM PROGRAM COMPONENTS

The D&D Hazard Communication Program focuses on:

- Identification of hazardous chemicals.
- Maintaining current hazard information (SDS, labels).
- Training employees on chemical hazards and safety measures.

All employees who may be exposed to hazardous chemicals must receive safety information and training before their initial assignment and whenever hazards change.

F. IDENTIFICATION OF HAZARDOUS CHEMICALS

Supervisors must identify hazardous chemicals based on their physical and chemical properties, potential health effects, and usage.

Supervisors should:

- Maintain a hazardous chemical inventory.
- Conduct activity hazard analyses (AHA) for tasks involving hazardous chemicals.
- Ensure that SDS for chemicals are available at the worksite.

G. EXPEDITED SDS LOOKUP

In case of emergencies, employees are encouraged to use smartphones or other devices to quickly access SDS information by searching the product name and "SDS" (e.g., "PB Blaster SDS").

H. MAINTAINING CURRENT HAZARD INFORMATION

Employees must be informed of chemical hazards before beginning work.

Hazard information is available via:

- Labels on chemical containers compliant with the Globally Harmonized System (GHS).
- Safety Data Sheets (SDS) provided by manufacturers.

I. LABELS

All hazardous chemical containers must have legible labels that include:

- Product identifier.
- Signal word.
- Hazard statements.
- Pictograms.
- Precautionary statements.
- Supplier information.

Original or secondary containers should never have labels removed or defaced. If relabeling is required, it must comply with OSHA's standards.

J. SAFETY DATA SHEETS (SDS)

SDS provides comprehensive information on chemical hazards, including physical and chemical properties, health risks, safe handling, and emergency procedures.

Each SDS must include:

- Identification
- Hazard(s) identification
- Composition/ingredients
- First-aid measures
- Firefighting measures
- Accidental release measures
- Handling and storage

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
HAZARDOUS COMMUNICATION PROGRAM- POLICY & PROCEDURE

- Exposure controls/PPE
- Physical and chemical properties
- Stability and reactivity
- Toxicological information
- Ecological information
- Disposal considerations
- Transport information
- Regulatory information
- Other information

Supervisors must ensure that SDS are accessible and up-to-date.

K. NON-ROUTINE TASKS

Supervisors are responsible for informing employees of hazards and safety procedures for non-routine tasks involving hazardous chemicals. Information provided must include specific hazards and the necessary protective measures.

L. INFORMING CONTRACTORS AND CONTRACT WORKERS

Workers must be informed of hazards they may encounter on D&D project sites. The contractor, not D&D, is responsible for providing their employees with the necessary training.

M. CONTRACTORS INFORMING D&D OF HAZARDOUS CHEMICALS

Outside contractors must inform the D&D project team of any hazardous chemicals they bring onto the site.

N. OSHA PEL

For a list of OSHA Permissible Exposure Limits (PEL), visit the following: [OSHA PEL Table Z-1](#)

O. ROLES AND RESPONSIBILITIES

This section outlines the key responsibilities for maintaining a safe environment and ensuring compliance with the Hazard Communication Program.

1. Safety & Health Director (SHD)

- Maintain and update the Hazard Communication Program.
- Ensure training is conducted, and policies are enforced.
- Review and update the program for compliance and effectiveness.

2. PM and Supervisors

- Identify hazardous chemicals and maintain chemical inventories.
- Ensure proper labeling, SDS availability, and hazard communication at worksites.
- Train employees on chemical hazards and safety procedures.
- Respond to hazardous substance spills or exposures and assist with SDS look-up.

3. Employees

- Follow safety procedures when handling hazardous chemicals.
- Use proper PPE and comply with training on chemical hazards.
- Report spills, leaks, or exposure to hazardous chemicals immediately.

4. Contractors

- Inform D&D of any hazardous chemicals brought onto the project site.
- Ensure their personnel follow safety protocols and provide hazard information.
- Adhere to the D&D Hazard Communication Program or their own, if more stringent

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
HAZARDOUS COMMUNICATION PROGRAM- POLICY & PROCEDURE

SUMMARY

The D&D Hazard Communication Program protects employees and subcontractors from hazardous chemical exposures by ensuring compliance with OSHA Hazard Communication Standard 29 CFR 1910.1200. The program emphasizes the safe handling, labeling, and usage of hazardous substances across all D&D project sites and office locations.

Key components include:

- **Policy:** All personnel must be informed of chemical hazards through proper labeling, Safety Data Sheets (SDS), and formal training. The program ensures employees are provided with protective measures to minimize exposure.
- **Applicability:** This program applies to all D&D employees, subcontractors, and vendors, with more stringent external policies taking precedence when applicable.
- **Hazardous Chemical Identification:** Supervisors are responsible for identifying hazardous chemicals, maintaining chemical inventories, and conducting hazard analyses.
- **SDS and Labeling:** SDS must be readily available, and all chemical containers must be appropriately labeled per the **Globally Harmonized System (GHS)**.
- **Employee Training:** Employees receive training on chemical hazards before initial assignment or when new hazards arise. Emergency procedures, exposure prevention, and safe handling methods are emphasized.
- **Contractor Communication:** D&D ensures that contractors are informed of workplace hazards and requires contractors to provide hazard information for chemicals they introduce to the site.
- **Program Review:** The program is subject to regular review by the **Safety & Health Director (SHD)** to ensure ongoing compliance and safety improvements.

This program promotes a proactive approach to chemical hazard management, ensuring a safe working environment for all personnel on D&D projects.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PERSONAL PROTECTIVE EQUIPMENT- POLICY & PROCEDURE

PERSONAL PROTECTIVE EQUIPMENT- POLICY & PROCEDURE

Revision Date- 9/24/2024

ACRONYMS

ANSI - American National Standards Institute

ASTM - American Society for Testing and Materials

CFR - Code of Federal Regulations

D&D - Daniels & Daniels

PEL - Permissible Exposure Limits

PFRS - Personal Fall Restraint System

PFAS - Personal Fall Arrest System

PPE - Personal Protective Equipment

SHD - Safety and Health Director

A. PURPOSE

This procedure establishes requirements for Daniels & Daniels (D&D) employees, contractors, visitors, and vendors regarding the proper selection, use, maintenance, and storage of personal protective equipment (PPE). When hazards cannot be eliminated, PPE is essential to mitigate and protect personnel from the risks associated with construction activities.

B. POLICY

The hierarchy of controls should be applied in the following order to eliminate or mitigate hazards before resorting to PPE:

- Elimination
- Substitution
- Engineering Controls
- Administrative Controls
- PPE

All personnel working within project limits or at the home office must use and maintain the necessary PPE to perform their tasks safely. Work activities should commence only after all required PPE is procured.

Responsibilities:

The Safety and Health Director (SHD) is responsible for identifying, selecting, procuring, and ensuring proper training for PPE use. Personnel must notify the SHD if additional PPE is needed, and the SHD will evaluate and procure appropriate equipment as necessary.

C. APPLICABILITY

This policy applies to all D&D employees, contractors, visitors, and vendors involved in any task requiring PPE to prevent injury. It governs PPE use for all tasks and inspections, regardless of duration.

Exceptions:

- Contractors, vendors, or visitors with PPE policies may follow their policy.
- If a governing entity requests that its PPE policy be followed, that policy takes precedence.

D. REFERENCES

- CFR 29 1926 Subpart C & E: General Safety & Health Provisions, Personal Protective Equipment
- CFR 29 1926.100, 1926.101, 1926.102: Head, Hearing, and Eye Protection
- EM 385-1-1 Section 5: Personal Protective & Safety Equipment

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PERSONAL PROTECTIVE EQUIPMENT- POLICY & PROCEDURE

E. PPE SELECTION & USE

PPE protects workers from physical, electrical, chemical, and mechanical hazards. It includes hard hats, face shields, goggles, gloves, vests, respirators, safety shoes, and protective clothing.

Minimum PPE required for D&D sites include:

- Long pants
- Shirt with at least 6" sleeves
- Leather work boots or approved footwear
- Hard hat
- High-visibility garment (vest, shirt, or jacket)
- Safety glasses
- Ear Plugs
- Gloves

Additional PPE, like personal fall protection, respirators, and welding protection, will be provided as needed.

F. INSPECTION REQUIREMENTS

All personnel must inspect PPE daily before use to identify any damage or defects. Although formal documentation of these inspections is not required, it is recommended. Defective PPE should be removed from service immediately, and the SHD must be notified.

Inspection items include checking for:

- Rips, tears, frays, holes, burns
- Scratched lenses, missing parts, or mechanical failures
- Contamination, wear, or breakdown in material
- Corrosion or rust on metal parts

G. PPE CARE & MAINTENANCE

Proper maintenance of PPE ensures it remains functional and effective. Personnel must clean and store PPE according to the manufacturer's instructions to avoid damage.

General Guidelines:

- **Hardhats:** Clean with mild soap, store out of direct sunlight, and replace if damaged.
- **Eye Protection:** Clean regularly, avoid scratching, and replace if frames or lenses are compromised.
- **Respirators:** Clean, disinfect, and store in a dry environment. Dispose of damaged or worn-out filters.
- **Gloves:** Ensure they are dry, clean, and holes-free. Replace when worn.
- **Ear Protection:** Clean reusable and replace disposable plugs regularly after each use.
- **Foot Protection:** Clean and dry footwear daily, check for damage, and replace when necessary.
- **Fall Protection:** Clean with warm, soapy water, and store safely after drying.

H. D&D PPE DISTRIBUTION, CARE & EXCLUSIONS

D&D will supply personnel with PPE required for tasks, with the following exceptions:

- Non-specialty safety-toe footwear (steel/composite toe boots)
- Prescription safety eyewear
- Everyday clothing and weather-protection gear (e.g., long sleeves, boots, gloves, jackets)

Unless otherwise specified, D&D is not responsible for providing PPE to non-D&D personnel, such as contractors or vendors.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PERSONAL PROTECTIVE EQUIPMENT- POLICY & PROCEDURE

I. SPECIFIC PPE REQUIREMENTS

- **Hard Hats:** They must meet ANSI Z89.1 standards and be worn during all construction phases.
- **Safety Glasses:** They must comply with ANSI Z87.1 standards. Safety glasses should be worn when exposed to hazards from flying debris, chemicals, or tools. Prescription lenses must meet Z87.1 standards or be worn with safety goggles. Specialty glasses are required for laser exposure.
- **Face Shields** are required when operating equipment such as saws and grinders or when working with hazardous materials.
- **Hearing Protection:** Required when noise levels exceed permissible limits per OSHA standards.
- **Fall Protection:** This is mandatory when exposed to falls greater than 6 feet unless alternative fall protection systems exist.
- **High Visibility Garments:** Worn during all construction phases. Particular standards (Class 1, 2, or 3) apply to personnel exposed to vehicular traffic.
- **Gloves:** These are required for handling sharp, abrasive objects or when tool manufacturers specify.
- **Foot Protection:** Leather work boots with safety toe protection are recommended for all construction phases unless no foot hazards are present.
- **Respiratory Protection:** Required when exposed to airborne contaminants above permissible limits.
- **Electrical PPE:** Required per 29 CFR 1910.137 for all electrical tasks.
- **Welding PPE:** Required per 29 CFR 1926.353 and 1926.102 for welding, cutting, and heating tasks.

J. TRAINING

All personnel must receive training on proper selection, use, maintenance, and storage before they are authorized to use PPE. Only trained and authorized personnel should use PPE.

K. ROLES AND RESPONSIBILITIES

This section outlines clear roles in ensuring compliance with PPE protocols to maintain safety on all D&D project sites and at the home office.

1. **Safety and Health Director (SHD):**

- Identify, select, and procure all required PPE.
- Ensure PPE training for all personnel on proper selection, use, maintenance, and storage.
- Address requests for new or additional PPE and evaluate its necessity.
- Approve any changes to the PPE policy.

2. **D&D Personnel:**

- Use the appropriate PPE for each task.
- Conduct daily PPE inspections before use and remove defective PPE from service.
- Report any PPE issues or hazards to the SHD.
- Follow manufacturer instructions for PPE use, maintenance, and storage.

3. **Contractors, Vendors, and Visitors:**

- Comply with the D&D PPE policy or their own, if more stringent.
- Ensure they have the necessary PPE on D&D sites or at the home office.

4. **All Personnel:**

- Only trained and authorized personnel may use PPE.
- Report any PPE deficiencies or requirements to the SHD for evaluation.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PERSONAL PROTECTIVE EQUIPMENT- POLICY & PROCEDURE

SUMMARY

This PPE Program establishes the guidelines and procedures to ensure the safety of all D&D employees, contractors, visitors, and vendors through proper PPE selection, use, and maintenance. It emphasizes that hazards should first be eliminated or mitigated using the Hierarchy of Controls before relying on PPE as the final protective measure.

Key elements of the program include:

- **Purpose:** To protect personnel from workplace hazards that cannot be eliminated.
- **Policy:** Hazard controls must be attempted first, with PPE as the last line of defense. Personnel must be trained and equipped with appropriate PPE for their tasks.
- **Applicability:** This program applies to all personnel on D&D project sites and the home office, with some exceptions based on location-specific policies.
- **PPE Requirements:** Specific guidelines for inspecting, maintaining, and using standard-issue and specialty PPE, including hardhats, safety glasses, hearing protection, fall protection, and other equipment for specialty tasks like welding and respiratory protection.
- **Training:** Personnel must be trained in PPE selection, use, and maintenance, and only trained and authorized individuals may use PPE.
- **Inspection and Maintenance:** PPE must be inspected daily before use, and defective equipment must be removed from service. Proper storage, cleaning, and maintenance of PPE are critical to ensuring its effectiveness.

The program also addresses the minimum PPE requirements for site entry, distribution policies, and the organization's responsibility in procuring and providing PPE, excluding non-specialty items like footwear and prescription eyewear. Safety protocols for specific activities, exceptions, and adherence to regulatory standards are integral components of the program.

This summary highlights the essential framework of the D&D commitment to maintaining a safe work environment through the effective use of PPE.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
MEDICAL SERVICES & FIRST AID PROCEDURES- POLICY & PROCEDURE

MEDICAL SERVICES & FIRST AID PROCEDURES- POLICY & PROCEDURE
REVISION DATE- 9/24/2024

ACRONYMS

AED- Automated External Defibrillator

CPR- Cardiopulmonary Resuscitation

D&D- Daniels and Daniels

EMS- Emergency Medical Services

SHD- Safety & Health Director

A. PURPOSE

This document outlines the procedures for first aid response in emergency and non-emergency medical situations at all Daniels & Daniels (D&D) project sites, remote offices, and home office locations. It covers the placement and usage of first aid kits and the procedure for contacting local emergency services.

B. POLICY

All D&D employees must assist injured or ill personnel at any job site. At a minimum, emergency services must be summoned when required, and employees must follow the procedures outlined in this program.

C. GENERAL STATEMENT

First aid kits and trained first aiders are not substitutes for professional Emergency Medical Services (EMS). First aid kits allow for the treatment of minor medical incidents, while EMS should be contacted immediately in severe situations, including:

- Loss of consciousness
- Excessive bleeding
- Possible broken bones
- Head, neck, or back injuries
- Serious burns
- Cardiovascular disorders

D. EMERGENCY MEDICAL SERVICES

Before construction begins, the Safety and Health Director (SHD) must ensure the availability of local medical personnel and facilities.

The following information must be posted on the job site safety board:

- D&D emergency contact names and numbers
- Emergency number (#911)
- Local police and fire department contact information
- Map and directions to the nearest hospital and urgent care
- Name and address of the project site

During project safety orientation, all personnel should be made aware of the location and contents of the safety board. Cellular phones are the primary means of communication for emergency services. Individuals without a personal or company phone must be allowed to use a D&D company phone in emergencies.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
MEDICAL SERVICES & FIRST AID PROCEDURES- POLICY & PROCEDURE

E. FIRST AID KITS

Each D&D project site, office, and home office must have at least one Class A Type III 25-Person First Aid Kit, and all company vehicles should carry a minimum Class A Type III 25-Person First Aid Kit.

Kit accessibility and maintenance

- First aid kits should be easily accessible and protected from weather conditions.
- The site supervisor must regularly check the contents for completeness, condition, and expiration.
- Used items must be logged, including the nature of the injury, cause, and name of the person treated.
- The First Aid Kit usage log can be found on PlanGrid/Safety Department/Documents/First Aid, CPR & AED.

Minimal first aid kit contents

- | | |
|--|---------------------------------------|
| • (2) Trauma Pad 5" x 9" | • (10) Antiseptic Towelettes |
| • (1) Triangular Sling/Bandage 40" x 40" x 56" | • (1) CPR Mask with one-way valve |
| • (1) First Aid Guide | • (1) Burn Dressing 4" x 4" |
| • (1) Conforming Gauze Roll 2" | • (10) First Aid/Burn Cream Pack 0.9g |
| • (1) Scissors | • (1) Cold Compress 4" x 5" |
| • (4) Gauze Dressing Pads 3" x 3" | • (2) Sterile Eye Pads |
| • (32) Plastic Bandages 1" x 3" | • (1) Eyewash 1 oz |
| • (1) First Aid Tape ½" x 5 yd | • (6) Hand Sanitizer 0.9g |
| • (10) Triple Antibiotic Ointment Packs | • (4) Nitrile Gloves |

Government projects compliance

For projects governed by EM-385 1-1, the following criteria apply:

- Projects with fewer than 100 employees and no first aid station or health clinic, or more than 5 minutes from medical facilities, must comply with ANSI Z308.1.
- There should be one first aid kit for every 25 employees.
- At least two employees per shift must be qualified in first aid and CPR.

F. FIRST AID OVERVIEW

First aid is the immediate help provided to someone ill or injured. A first aider offers this help while ensuring the safety of all individuals involved.

Responsibilities of first aid personnel

First aiders must provide immediate care to preserve life and prevent further injury.

Their actions may include:

- Placing an unconscious casualty in the recovery position
- Performing CPR
- Stopping bleeding through pressure and elevation
- Supporting fractured limbs
- Calling EMS
- Recognizing their training skill limitations

G. DUTY OF CARE

Employers must provide first-aiders under the Health and Safety at Work Act 1974 and the Health and Safety (First Aid) Regulations 1981.

Duty of care definition

The duty of Care is the legal obligation to ensure the safety of sick or injured individuals. First aiders must provide care until a medical professional takes over or the situation becomes unsafe.

Initial steps before providing first aid

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
MEDICAL SERVICES & FIRST AID PROCEDURES- POLICY & PROCEDURE

1. Ensure the scene is safe.
2. Introduce yourself and ask for permission to help (obtain consent).
3. Assess the situation and determine the type of help needed.
4. Call EMS if severe injury or illness is suspected.

H. GAINING CONSENT

To gain consent:

- Introduce yourself as a trained first aider.
- Explain why you are there and what assistance you intend to provide.

Implied consent

Assume consent if the victim:

- Is unconscious
- Has a significantly reduced level of consciousness

Judgment of consent

In certain situations (intoxication, confusion, minors), first aiders may need to treat a victim who initially refuses care. Document the decision and rationale.

I. CARDIOPULMONARY RESUSCITATION (CPR)

Before giving CPR

1. Ensure the scene is safe.
2. Tap the person and shout, "Hey, are you okay?"
3. Call 911 for assistance and obtain an AED if possible.
4. Open the airway by tilting the head back.
5. Check for breathing for no more than 10 seconds.

CPR steps

1. Perform chest compressions: 30 compressions at least 2 inches deep at a rate of 100 compressions per minute.
2. Deliver two rescue breaths: seal the mouth, pinch the nose, and blow into the mouth until the chest rises.
3. Continue cycles of compressions and rescue breaths until help arrives or the person shows signs of life.

J. LIMITATIONS OF FIRST AID

First-aiders must recognize their limitations and seek professional help immediately in emergencies. The risks of further injury may outweigh the benefits of immediate treatment.

K. MINOR FIRST AID TREATMENT

For minor cuts or scrapes:

1. Wash your hands to prevent infection.
2. Stop any bleeding.
3. Clean the wound.
4. Apply an antibiotic or petroleum jelly.
5. Cover the wound.
6. Change the dressing as needed.
7. Monitor for signs of infection.

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MEDICAL SERVICES & FIRST AID PROCEDURES- POLICY & PROCEDURE

L. NON-EMERGENCY MEDICAL TREATMENT

Non-emergency conditions should be treated at the nearest facility as soon as possible. Job site safety boards provide the necessary facility information.

M. EMERGENCY MEDICAL TREATMENT

Emergency medical services evaluate or stabilize acute conditions. In emergencies, provide transportation if the person is conscious and mobile or summon EMS if not.

Calling emergency services

Dial 911 for emergencies.

For more information on responding to various conditions, refer to your NSC First Aid Quick Guide.

N. ROLES AND RESPONSIBILITIES

1. Safety and Health Director (SHD):

- Oversee the implementation and adherence to the first aid program.
- Ensure the availability of medical personnel and emergency services at project sites.
- Conduct regular training and drills related to first aid and emergency response.

2. Site Supervisor:

- Ensure the availability and maintenance of first aid kits at the job site.
- Conduct periodic checks of first aid supplies and equipment.
- Ensure all employees know the available emergency medical services and how to contact them.

3. All D&D Employees:

- Assist injured or ill personnel.
- Familiarize themselves with first aid kit locations and emergency contact information.
- Participate in safety orientations and training sessions.

4. First Aider:

- Provide immediate first aid to injured or ill individuals.
- Assess the situation, ensure scene safety, and gain consent before administering care.
- Document all first aid provided, including the nature of injuries and treatments given.

SUMMARY

This first aid program provides guidelines for D&D employees regarding the provision of first aid and emergency medical assistance in various situations. It emphasizes the importance of timely and effective responses to medical incidents at D&D project sites, remote offices, and home offices.

Key components of the program include:

- **Purpose:** To outline steps for first aid responders and establish procedures for contacting emergency services.
- **Policy:** All D&D employees are required to assist injured or ill personnel and ensure emergency services are contacted when necessary.
- **General Statement:** First aid kits and trained personnel are immediate response tools, not substitutes for professional medical services.
- **Emergency Medical Services:** Guidelines for ensuring the availability of medical assistance and contact information at job sites.
- **First Aid Kits:** Specifications for the contents, accessibility, and maintenance of first aid kits at all D&D locations.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
MEDICAL SERVICES & FIRST AID PROCEDURES- POLICY & PROCEDURE

- **First Aid Personnel Responsibilities:** First aiders have duties that include administering care, gaining consent, and understanding training limitations.
- **Minor and Emergency Medical Treatment:** Procedures for treating minor injuries and identifying situations that require emergency medical attention.

This program underscores the D&D commitment to the health and safety of all personnel by ensuring proper training, accessible resources, and clear protocols for responding to medical incidents.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
EMERGENCY ACTION PLAN- POLICY & PROCEDURE

EMERGENCY ACTION PLAN- POLICY & PROCEDURE

Revision Date- 9/24/2024

ACRONYMS

D&D- Daniels and Daniels

EAP- Emergency Action Plan

PM- Project Manager

SHD- Safety & Health Director

SSHO- Site Safety & Health Officer

A. PURPOSE

Establish guidelines and minimum requirements for developing and implementing an Emergency Action Plan (EAP) at D&D project sites.

B. POLICY

All D&D project sites must develop and implement a site-specific EAP.

C. GENERAL

The objective of the EAP is to prepare for emergencies, prevent fatalities and injuries, and minimize damage to buildings, stock, and equipment. The EAP is a living document that should be updated as required to reflect changes in the workplace, personnel, and procedures.

A site-specific EAP should include the following elements:

- Names and contact information for the Safety and Health Director (SHD), SSHO, Superintendent, Project Manager (PM), local law enforcement, and nearest medical facilities.
- Project floor plans.
- Employee warning communication systems.
- Procedures for accounting for employees.
- Evacuation procedures and routes.
- Medical aid and first aid treatment protocols.
- Plans for workplace violence/active shooter incidents.
- Severe weather and fire prevention plans.

D. ESTABLISHING AN EAP

Four main steps:

1. Write the plan (SHD/project team).
2. Establish a training schedule (during project orientation).
3. Assign responsibility for training (project team).
4. Coordinate plans with outside organizations (local emergency services).

First Step in the Planning Process:

- Conduct a risk assessment to identify potential emergencies, including hazardous conditions, severe weather, and natural disasters. This assessment should consider the project's location, unique features, and specific risks.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
EMERGENCY ACTION PLAN- POLICY & PROCEDURE

E. EAP PLANNING PROCESS: FOUR CONCEPTS

Plan your EAP with these four concepts in mind:

1. **Mitigation:** Identify and implement actions to reduce or eliminate risks associated with hazards, emergencies, or disasters.
2. **Preparedness:** Establish plans and procedures to ensure safety before, during, and after emergencies.
3. **Response:** Develop written procedures to minimize the impact of emergencies and facilitate recovery.
4. **Recovery:** Create a structured approach to resume operations after an unplanned incident quickly.

F. EXECUTING THE EAP: THREE STEPS

1. Determine evacuation procedures and emergency escape route assignments.
2. Establish a chain of command and designate an authorized person to order evacuations.
3. Implement procedures to account for all employees after an evacuation.

G. CREATING A SIMPLE EAP

Utilize the OSHA eTool to create a simple EAP suitable for small—to medium-sized projects. Larger projects may require additional customization. Access the eTool [here](#).

Using the eTool

Develop your EAP following the twelve-step process in the eTool.

H. COMMUNICATION & TRAINING OF THE EAP

Communication and EAP training should be included in contractor orientation and reviewed during weekly toolbox meetings. Each contractor supervisor should receive a copy of the EAP. Drills and exercises should be conducted during the project to demonstrate proficiency in the plan and identify weaknesses.

I. ROLES AND RESPONSIBILITIES

- **Safety and Health Director (SHD):** Oversees the EAP's development and implementation.
- **Site Safety and Health Officer (SSHO):** Leads the EAP development if assigned.
- **Superintendent:** Coordinates input from the project team and has overall responsibility.
- **Project Team:** Contributes to the EAP's content and ensures training is provided.
- **Contractor Supervisors:** Conduct EAP training and ensure their teams understand the plan.

SUMMARY

The Emergency Action Plan ensures safety and preparedness at D&D project sites. This plan outlines responsibilities, procedures, and training necessary to respond effectively to emergencies, thus minimizing risks to personnel and property. A well-developed EAP is essential for compliance with OSHA standards and the safety of all employees.

END OF SECTION.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
EMPLOYEE REPORT OF HAZARDS- POLICY & PROCEDURE

EMPLOYEE REPORT OF HAZARDS- POLICY & PROCEDURE

Revision Date- 9/24/2024

ACRONYMS

D&D- Daniels and Daniels

PM- Project Manager

PE- Project Engineer

SSHO- Site Safety & Health Officer

SHD- Safety & Health Director

QCM- Quality Control Manager

A. PURPOSE

To establish guidelines for employees to report hazards in the workplace, ensuring a safe environment for all.

B. POLICY

All employees, regardless of rank or tenure, must report hazardous conditions immediately. Prompt reporting and corrective actions are essential for maintaining workplace safety.

C. EMPLOYEE RIGHTS

Employees have the right to:

- Work in an environment free from recognized hazards.
- Raise safety or health concerns without fear of retaliation.

D. EMPLOYEE REPORTING

1. Reporting Procedures:

- All employees must report hazardous conditions to their supervisors, regardless of rank or tenure.
- Supervisors are responsible for documenting these hazards and taking prompt corrective action.
- Documented hazardous conditions and safety violations should be recorded in the following:
 - Daily government contractor production report under the “Job Safety” section.
 - D&D Daily Project Safety Inspection on PROCORE

2. Supervisor Responsibilities:

- If a supervisor is uncertain about the corrective action needed, they should immediately contact the Safety and Health Director (SHD).

E. NEAR-MISS REPORTING

All D&D employees and subcontractors must report near-miss situations immediately. Reporting near misses allows the organization to understand causes and implement preventative measures, reducing the risk of personal injury or property loss.

F. CORRECTIVE ACTION

All documented hazardous conditions or safety violations must be corrected as soon as reasonably practicable:

- Conditions that can be corrected within 24 to 48 hours should be addressed promptly.
- All other hazardous conditions must be corrected by the start of the next shift.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
EMPLOYEE REPORT OF HAZARDS- POLICY & PROCEDURE

The SHD must be notified immediately if any hazardous conditions or safety violations are not corrected promptly.

G. ROLES AND RESPONSIBILITIES

Employees:

- Report hazards and near misses.
- Participate in safety training and initiatives.

Supervisors:

- Ensure immediate reporting and documentation of hazards.
- Take prompt corrective actions or escalate to SHD when necessary.

Safety and Health Director (SHD):

- Oversee the hazard reporting process.
- Ensure corrective actions are implemented and monitored.

H. SUMMARY

This policy outlines the responsibilities of employees and supervisors in reporting hazards and near misses to foster a safe work environment. All staff members are encouraged to participate in safety and report conditions without hesitation. Immediate corrective action is crucial to preventing accidents and injuries.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
ACCIDENT REPORTING & INVESTIGATION PROCEDURES- POLICY & PROCEDURES

ACCIDENT REPORTING & INVESTIGATION PROCEDURES- POLICY & PROCEDURES

Revision Date- 9/24/2024

ACRONYMS

D&D- Daniels and Daniels

GDA- Government Designated Authority

LHE- Load Handling Equipment

OSHA- Occupational Safety & Health Administration

SHD- Safety & Health Director

A. PURPOSE

This policy establishes guidelines and minimum requirements for reporting and investigating accidents, incidents, and near-misses.

B. POLICY

All accidents, incidents, and near-misses must be reported accurately and promptly, regardless of their significance. D&D employees must also follow the procedures outlined in this policy.

Definitions:

- **Accident:** An unexpected event resulting in severe injury, illness, or property damage caused by personal error, other human error, or unrecognized hazards.
- **Incident:** An unintended event that disrupts normal operations but does not result in severe injury or illness, although it may cause property damage.
- **Near-Miss:** An unplanned event that did not result in injury, illness, or damage but had the potential to do so.
- **Mishap:** Any unplanned, undesired event occurring during work, including accidents, incidents, and near-misses.

C. INVESTIGATION PROCEDURES

1. Accident & Incident Investigation

- The immediate supervisor is responsible for securing the area and notifying the SHD.
- Evacuate and barricade any occupied structures if severe damage occurs.
- Ensure injured personnel receive medical attention before beginning the investigation.
- Collect statements, photographs, and evidence from the scene.

2. Evidence and Documentation

- Statements should be handwritten or audio-recorded, detailing the mishap and witness information, and signed by the witness.
- Photographs of the scene must be taken from multiple angles.
- All evidence, such as faulty equipment or lack of training, must be preserved and documented.

3. Determination of Causes

After collecting all information:

- Identify hazards.
- Determine root causes by applying the "5 Whys" method.
- Develop a corrective action plan and implement safeguards to prevent recurrence.

D. REPORTING PROCEDURES

1. Accident & Incident Reporting

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
ACCIDENT REPORTING & INVESTIGATION PROCEDURES- POLICY & PROCEDURES

- All D&D employees must report all mishaps to the SHD as soon as possible, regardless of severity.
- Incidents not requiring professional medical attention or significant monetary value should be documented in the daily superintendent report.
- After reporting, the SHD will notify applicable personnel.

2. Company Vehicle Accident Reporting

Vehicle accidents must be reported to the Equipment Manager and the SHD. In case of a moving accident:

- Call 911 and report the accident. Regardless of the level of significance.
- Check for injuries; if present, summon emergency medical services.
- Move vehicles to a safe location if necessary.
- Notify the Equipment Manager and SHD of the accident's details.
- Document the scene with photographs.
- Exchange insurance information and request a report number from law enforcement.

3. Near-Miss Reporting

All near-miss situations must be reported immediately. Reporting near misses helps identify potential hazards, enables proactive risk management, and improves workplace safety culture.

E. ROLES AND RESPONSIBILITIES

- **All Employees:** Report all accidents, incidents, and near misses.
- **Supervisors:** Secure the scene, notify the SHD, and assist in investigations.
- **SHD:** Oversee reporting and investigation processes, ensuring compliance with safety regulations and conducting follow-up actions.
- **Executive Management:** Review investigation outcomes and determine necessary disciplinary actions.

F. DISCIPLINARY ACTION

1. Failure to Report

Failure to accurately and promptly report incidents may result in disciplinary action, including written notices, loss of privileges, or termination based on severity.

2. Reporting Requirements

All incidents that require reporting include, but are not limited to:

- Damage to D&D property or vehicles.
- Injuries involving any personnel or the public.
- Any near misses or unsafe conditions.
- Harassment or abuse in the workplace.

3. Reporting to Authorities

Accidents with severe consequences (e.g., fatalities and severe injuries) must be reported to OSHA and the (GDA- Federal Projects) within specific timeframes, as detailed in the original policy.

G. SUMMARY

This policy outlines the process for reporting and investigating accidents, incidents, and near-misses at D&D. All employees are responsible for ensuring a safe work environment by adhering to these procedures. Prompt reporting and thorough investigations help identify hazards and implement corrective actions, fostering a culture of safety and compliance.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
DAILY PROJECT REPORTING- POLICY & PROCEDURE

DAILY PROJECT REPORTING- POLICY & PROCEDURE

Revision Date- 9/25/2024

ACRONYMS

D&D- Daniels and Daniels

ET- Engineering Technician

QCM- Quality Control Manager

SHD- Safety and Health Director

SSHO- Site Safety and Health Officer

PM- Project Manager

A. PURPOSE

This policy establishes the guidelines and minimum requirements for completing and submitting daily reports for Daniels & Daniels (D&D) projects in the private and federal-military sectors.

B. POLICY

Daily reports must be completed and submitted on time for all projects, regardless of whether work is performed. Reports should accurately reflect site conditions, safety issues, and activities. For federal/military projects, reporting is required every calendar day, including non-working days, unless specified otherwise by the contract.

C. PRIVATE SECTOR PROJECT REPORTING

Daily reports for private sector projects must be completed using the D&D daily report template. These reports must be submitted by the end of the shift. In cases of delayed submission, they must be sent no later than 8:00 AM the following morning.

If multiple superintendents are present on a project, each must complete and submit their daily report as required by their responsibilities.

D. FEDERAL/MILITARY PROJECT REPORTING

Daily reports for federal/military projects should be submitted using the appropriate government templates, including the Contractor Production Report and Contractor Quality Control Report. Reports must be submitted by the end of the shift and coordinated with the project's engineering technician (ET).

Typically:

- The Superintendent submits the Contractor Production Report.
- The QCM submits the Contractor Quality Control Report.

Sometimes, the ET may designate one employee to submit both reports. Reports should be sent via email, and the subject line must include the project name, contract number, task order, and "Daily Reports."

Example:

Replace Pool Liner/Contract #N4008516D6301/Task Order #N4008521F4900/Daily Reports

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
DAILY PROJECT REPORTING- POLICY & PROCEDURE

E. ACCURATE & DETAILED REPORTING

Reports must contain accurate, detailed information covering all relevant areas, including:

- Contractor names and the number of personnel/hours worked.
- Visitor names and roles.
- Activities performed, including specific locations (e.g., column lines, room numbers).
- Equipment used (specific makes and models).
- Safety inspections, hazards identified, and corrective actions.
- Observed safety violations.

Every section of the report must be completed, and all pertinent details must be documented.

F. SAFETY REPORTING

Site safety inspections should be conducted daily, and any deficiencies noted must be documented in the daily report.

- Record unsafe conditions and safety violations in the Contractor Production Report under the "Job Safety" section and the safety deficiency tracking log for military projects.
- For private sector projects, record safety-related information in the safety section on the PROCORE D&D daily report.

The report must include:

- Date of the violation.
- Name of the company and employee involved.
- Nature of the unsafe condition or violation.
- Corrective action taken and the date the issue was resolved.

The SHD should be notified of any unsafe conditions or safety violations that cannot be remedied within 24-48 hours.

Refer to the Safety Inspections P&P for further details on safety inspections.

G. ROLES AND RESPONSIBILITIES

Superintendent: Completes and submits the Contractor Production Report (federal/military) or D&D daily report (private sector).

QCM: Completes and submits the Contractor Quality Control Report (federal/military) and monitors safety compliance.

ET: Coordinates daily report submissions for federal/military projects and provides instructions on report submission protocols.

SSHO: Ensures that safety violations and hazards are reported and corrected.

PM: Oversees compliance with reporting standards and ensures reports are submitted on time.

H. POLICY SUMMARY

All D&D personnel must submit daily reports for private and federal-military projects. These reports should provide detailed, accurate information about site activities, safety inspections, and identified hazards or violations. Adherence to these procedures ensures accountability, transparency, and compliance with contract requirements.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
BLOODBORNE PATHOGEN PROGRAM- POLICY & PROCEDURE

BLOODBORNE PATHOGEN PROGRAM- POLICY & PROCEDURE

Revision Date- 9/26/2024

ACRONYMS

BBPP - Bloodborne Pathogens Program

D&D - Daniels & Daniels

ECP - Exposure Control Plan

OPIM - Other Potentially Infectious Material

SHD - Safety & Health Director

SOP - Standard Operating Procedures

A. PURPOSE

The Daniels & Daniels (D&D) Bloodborne Pathogens Program (BBPP) aims to eliminate or minimize occupational exposure to bloodborne pathogens and ensure compliance with OSHA's Bloodborne Pathogens Standard (29 CFR 1910.1030). This program establishes the guidelines for employee safety and risk mitigation.

B. SCOPE

This Exposure Control Plan (ECP) is designed to minimize employee exposure to bloodborne pathogens. The ECP applies to all D&D employees potentially exposed to bloodborne pathogens while rendering first aid or assisting in the cleanup of blood or OPIM during their duties.

C. POLICY

Employees exposed to human blood or OPIM must adhere to the BBPP and ECP guidelines. The policy encourages injured individuals to self-administer first aid where possible, minimizing others' direct contact with blood or OPIM. Employees may assist verbally by providing instructions on cleaning and dressing the wound when required.

D. APPLICABILITY

This BBPP applies to all D&D personnel.

E. REFERENCES

- 29 CFR 1910.1030 (General Industry Bloodborne Pathogens Standard)
- 29 CFR 1926 (Construction Industry Standards)

F. EXPOSURE DETERMINATION

The SHD will maintain an exposure determination that lists all job classifications where employees are likely to have occupational exposure to bloodborne pathogens. This includes jobs where certain tasks and procedures carry a risk of exposure. The determination is updated for new or modified tasks and employee roles.

G. METHODS OF COMPLIANCE: UNIVERSAL PRECAUTIONS

To prevent exposure, universal precautions must be observed. Key compliance measures include:

- **Hand Hygiene:** Handwashing facilities will be available, and employees must wash hands immediately after contact with blood or OPIM.
- **Prohibited Activities:** Eating, drinking, smoking, applying cosmetics, and handling contact lenses are prohibited in exposure areas.
- **Handling Blood/OPIM:** Blood and OPIM must be handled cautiously to avoid splashing, spraying,

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
BLOODBORNE PATHOGEN PROGRAM- POLICY & PROCEDURE

or spattering.

- **Sharps Disposal:** Contaminated needles and sharps must be disposed of safely in puncture-resistant containers. Recapping or shearing needles is prohibited.
- **Personal Protective Equipment (PPE):** D&D will provide PPE (gloves, gowns, face shields) at no cost. PPE must be worn when exposure risk is present and disposed of according to proper procedures.

H. HEPATITIS B VACCINATION

Hepatitis B vaccinations will be free to employees with occupational exposure. If an employee initially declines the vaccine but later chooses to receive it, D&D will make it available. Employees declining the vaccination must complete a Hepatitis B Declination Form.

I. POST-EXPOSURE INCIDENT PROCEDURES

After an exposure incident, the following steps must be taken:

- Notify the SHD immediately.
- Document the exposure routes and circumstances.
- Identify and, with consent, test the source individual's blood for HBV and HIV.
- Provide the exposed employee with confidential medical evaluation and follow-up, including post-exposure prophylaxis if required.

J. COMMUNICATION OF HAZARDS

Containers with blood or OPIM will be marked with biohazard labels, which must be fluorescent orange or red with contrasting symbols. Red bags can be used in place of labels.

K. RECORDKEEPING

D&D will maintain the following records:

- **Medical Records:** Confidential records of employees exposed to bloodborne pathogens.
- **Training Records:** These will be kept for three years.
- **Sharps Injury Log:** Records percutaneous injuries from contaminated sharps for five years.

L. BLOODBORNE PATHOGEN CLEAN-UP & DISPOSAL SOP

Contaminated materials (gauze, gloves, masks, etc.) should be disposed of in red biohazard bags. Surfaces contaminated with blood or OPIM must be cleaned promptly with disposable towels and a bleach solution. PPE must be worn during the cleanup process and disposed of according to guidelines in Section G.

M. TRAINING AND REPORTING

All employees at risk of exposure will receive training on the BBPP and ECP. Daily reporting on any potential exposure or unsafe conditions is required. The SHD will maintain all records and update exposure classifications as needed. Accurate reporting of incidents and near-misses is essential to maintain compliance and employee safety.

N. ROLES AND RESPONSIBILITIES

SHD: Develops and maintains the BBPP and ECP. Ensures proper training and availability of PPE. Manages incident investigations and recordkeeping.

Employees: Follow universal precautions, use PPE as required, and report all incidents or potential exposures to the SHD.

Supervisors: Ensure employees comply with BBPP, assist in incident reporting, and provide feedback on safety concerns.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
BLOODBORNE PATHOGEN PROGRAM- POLICY & PROCEDURE

O. NEW EMPLOYEE HEPATITIS B VACCINATION INFORMATION

Welcome to Daniels & Daniels Construction Company, Inc.

Your job classification has been identified as having potential occupational exposure to blood or other potentially infectious materials (OPIM). Job tasks you may be asked to perform that constitute occupational exposure are outlined in the D&D Bloodborne Pathogens Exposure Control Plan. This document outlines how D&D minimizes your exposure and your responsibilities related to bloodborne pathogens. The D&D safety department manages the Bloodborne Pathogens Exposure Control Plan following the [Occupational Safety and Health Administration \(OSHA\) Bloodborne Pathogens standard](#).

To be enrolled in the Bloodborne Pathogens Exposure Control Plan, you must do the following:

Complete Bloodborne Pathogens training. The D&D SHD will administer your training.

Review the Hepatitis B virus and vaccination information.

Decide whether to consent or decline to receive the Hepatitis B vaccination and complete each form section.

If you consent to receive the vaccination, please get in touch with the SHD to schedule an appointment.

If you decide to decline to receive the Hepatitis B vaccination, please complete the Hepatitis B Vaccination Declination form. The form must be returned to the D&D SHD for record-keeping purposes.

Questions regarding the Bloodborne Pathogens Exposure Control Plan should be referred to the SHD.

P. INFORMATION ON HEPATITIS B VIRUS AND VACCINATION

Hepatitis B is a viral infection caused by the Hepatitis B virus (HBV), primarily transmitted through exposure to contaminated human blood or other potentially infectious materials (OPIM). HBV infection can lead to severe liver disease, with symptoms including jaundice, dark urine, extreme fatigue, loss of appetite, nausea, abdominal pain, and sometimes rash or joint pain.

In about 20% of severe HBV cases, hospitalization is necessary. While most individuals recover fully, approximately 5% to 10% become lifelong virus carriers. Carriers face an increased risk of developing liver cirrhosis or cancer, both of which can be life-threatening. Pregnant carriers can also transmit the virus to their infants, with around 90% of infected newborns becoming carriers.

Hepatitis B immunization is offered at no cost to employees whose job responsibilities place them at risk of exposure to blood or OPIM, as detailed in the Exposure Control Plan. The vaccine is a noninfectious, yeast-based formulation, eliminating any risk of contamination from human blood or plasma. It cannot cause infection. While no severe adverse reactions have been linked to the vaccine, the possibility of rare, previously unobserved side effects cannot be entirely ruled out.

Reported potential reactions include:

- Injection site soreness, swelling, warmth, itching, redness, bruising, and nodule formation.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
BLOODBORNE PATHOGEN PROGRAM- POLICY & PROCEDURE

- Low-grade fever (less than 101°F), potentially within 48 hours following vaccination.
- Tiredness/weakness.
- Headache.
- Nausea and diarrhea.
- Sore throat and upper respiratory infection.
- Dizziness.
- Muscle aches.
- Joint pain.

Immunization for Hepatitis B consists of intramuscular vaccinations. The manufacturer determines the dose schedule and frequency.

Most individuals can safely receive the Hepatitis B vaccine. However, the following groups should consult their healthcare provider before vaccination: pregnant or nursing women, individuals with cardiopulmonary conditions, those with a known allergy to yeast, thimerosal, or formaldehyde, and individuals currently experiencing a fever or illness.

Q. INFORMATION TO BE PROVIDED TO HEALTHCARE PROFESSIONAL

1. For Hepatitis B Vaccination

Information provided to Healthcare Professionals:

- Copy of the Bloodborne Pathogen Standard

Healthcare Professionals' written response is limited to:

- Whether vaccination is indicated for employee
- Whether an employee has received vaccination

2. For Post-Exposure Incident Evaluation

Information provided to Healthcare Professionals:

- Copy of Bloodborne Pathogen Standard
- Description of employee's duties related to exposure
- Documentation of route of exposure and circumstances
- Results of the source individual's blood testing
- All relevant medical records, including vaccination status

Healthcare Professionals' written response is limited to the following:

- The employee has been informed of the results of the evaluation
- The employee has been made aware of any medical conditions resulting from the exposure that require further evaluation or treatment
- Other findings or diagnoses shall remain confidential and shall not be included in the written report

POLICY SUMMARY

This Bloodborne Pathogens Program outlines D&D's commitment to employee safety regarding bloodborne pathogens. By adhering to the guidelines in this program, employees will minimize risks related to occupational exposure to bloodborne pathogens. Compliance with training, reporting, and using PPE is critical to maintaining a safe work environment.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
BLOODBORNE PATHOGEN PROGRAM- POLICY & PROCEDURE

JOB CLASSIFICATIONS FOR EMPLOYEES WHO MAY HAVE OCCUPATIONAL EXPOSURE

FIELD OPERATIONS STAFF	
Job Classification	Occupational Exposure Task(s)
<ol style="list-style-type: none">1. Superintendent2. Assistant Superintendent3. Project Manager4. Quality Control Manager5. Site Safety & Health Officer6. Project Engineer7. ALL PERSONNEL FIRST AID TRAINED	<p>Delivering first aid services and medical treatment</p> <p>Clean-up of blood or OPIM</p>

OFFICE STAFF	
Job Classification	Occupational Exposure Task(s)
<ol style="list-style-type: none">1. ALL PERSONNEL FIRST AID TRAINED	<p>Delivering first aid services and medical treatment</p> <p>Clean-up of blood or OPIM</p>

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
BLOODBORNE PATHOGEN PROGRAM- POLICY & PROCEDURE

DANIELS & DANIELS CONSTRUCTION COMPANY, INC.

HEPATITIS B VACCINATION DECLINATION

I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring a Hepatitis B virus (HBV) infection. I have been allowed to be vaccinated with the Hepatitis B vaccine at no charge. However, I decline the Hepatitis B vaccination currently. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a severe disease. If, in the future, I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with the Hepatitis B vaccine, I can receive the vaccination series at no charge.

Employee Name (Print)

Employee Signature

Date

Please answer the following question that applies to you by selecting Yes or No.

☐ Yes ☐ No Are you declining because you do not wish to receive the HBV vaccine at this time?

☐ Yes ☐ No Are you declining because you have already received the HBV vaccine?

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
WEEKLY SITE TOOLBOX MEETINGS- POLICY & PROCEDURE

WEEKLY SITE TOOLBOX MEETINGS- POLICY & PROCEDURE

Revision Date- 9/26/2024

ACRONYMS

CAZ – Controlled Access Zone

D&D – Daniels and Daniels

PPE – Personal Protective Equipment

P&P – Policy & Procedure

SSHO – Site Safety and Health Officer

A. PURPOSE

This document outlines the guidelines and minimum requirements for conducting and documenting weekly site toolbox (safety) meetings at Daniels and Daniels Construction Company.

B. POLICY

At least one toolbox meeting must be held weekly at each project site, scheduled before the close of business on Wednesday. All D&D employees responsible for administering toolbox meetings must adhere to this P&P.

C. ROLES AND RESPONSIBILITIES

- Project Superintendent/SSHO: Responsible for conducting and documenting toolbox meetings.
- All On-site Personnel: Required to attend toolbox meetings without exception.
- Project Team: Coordinates to set the day and time of the weekly meeting.
-

D. ATTENDANCE AND DOCUMENTATION

A sign-in sheet will document attendance. All participants must sign the sheet, which will be retained for record-keeping and compliance purposes.

E. MEETING CONTENT

Toolbox meetings must focus on topics relevant to ongoing work. Key points to address include but are not limited to:

- Identification of existing or potential hazards
- High-risk activities
- General PPE requirements
- Controlled access zones (CAZ)
- Hoisting/lifting zones
- Areas restricted to specific personnel
- Observed safety violations or hazardous conditions
- Required inspections (daily): fall protection, equipment, ladders, drop cords, work area
- Upcoming site visits, holidays, and project closures
-

F. SCHEDULING

Toolbox meetings should be scheduled early, preferably between Monday and Wednesday. The ideal time is 15 minutes before the first break, around 9:15 AM. Once established, the schedule should only be altered when necessary.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
WEEKLY SITE TOOLBOX MEETINGS- POLICY & PROCEDURE

G. LOCATION

Meetings should be held on-site, ideally outdoors. In the case of inclement weather, an indoor location with sufficient space should be used.

H. SOURCES FOR TOOLBOX MEETING TOPICS

Toolbox meeting topics can be sourced from:

<https://www.oshatraining.com/Toolbox-Talks.php>

<https://safetytoolboxtopics.com/Toolbox-Talks/>

http://www.toolboxtopics.com/menu_generic_contents.html

NOTE These are examples; many other resources are available.

J. TOOLBOX MEETING DOCUMENTATION

All toolbox meetings should be documented and saved for record-keeping purposes. The documentation should include a copy of the toolbox meeting topic, a sign-in sheet, and other resources utilized to conduct the meeting.

NOTE Document any other topics or specific situations discussed during the toolbox meeting.

K. CONDENSED ROLES & RESPONSIBILITIES

- Project Superintendent/SSHO: Conduct and document meetings.
- All Personnel: Attend, sign in, and adhere to discussed safety practices.

POLICY SUMMARY

Toolbox meetings are a critical component of D&D's commitment to site safety. Weekly meetings provide a platform to address safety hazards, promote communication, and ensure compliance with safety standards. All personnel must attend and contribute to a culture of safety awareness.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PRECONSTRUCTION CONFERENCE (SAFETY)- POLICY & PROCEDURE

PRECONSTRUCTION CONFERENCE (SAFETY)- POLICY & PROCEDURE

Revision Date- 9/26/2024

ACRONYMS

D&D- Daniels and Daniels

GS- General Superintendent

SHD- Safety & Health Director

SSHO- Site Safety & Health Officer

PM- Project Manager

PE- Project Engineer

PRE-CON- Pre-construction

A. PURPOSE

The following should establish the guidelines and minimum requirements for conducting Pre-construction Meetings (PRE-CON). The primary purpose of a PRE-CON is to communicate the plans and expectations to everyone on the project team before any job is executed on-site. It starts by defining the roles and responsibilities of all team members and all the construction procedures necessary for safe job execution.

B. SCHEDULING & LOCATION

The PM should schedule the PRE-CON before the commencement of construction. The PRE-CON should be scheduled a minimum of 2 weeks in advance. The PRE-CON should be conducted at the D&D home office in the training conference room.

NOTE The owner, architect, or governing agency responsible for the project may require a PRE-CON meeting with their involvement. They may also lead the meeting and conduct it based on their agenda. They may also determine the location of the meeting.

C. ATTENDEES

The following representation should be invited and encouraged to attend the PRE-CON. Required D&D representation- SHD, Superintendent, SSHO (if applicable), PM, and PE (if applicable). Depending on the size and complexity of a project, few or many subcontractors may be involved during its duration. The involvement of the following subcontractors should be considered vital.

These contractors include but are not limited to the following:

- Civil (Site work & Utilities)
- Structural (Concrete, Masonry, Steel Erector, Framers)
- Building Systems (Fire Protection, Electrical, Plumbing, Mechanical, Fire Alarm)
- Roofing
- Glazing (Store Front, Windows)
- Finishes (Gypsum Board Hangers & Finishers, Painter)

The subcontractor PM and or Supervisor representation is preferred.

Suppose the subcontractor PM or supervisor cannot attend the PRE-CON in person due to schedule conflicts. In that case, another qualified individual should represent that subcontractor present at the meeting. If the subcontractor representative is unavailable to attend the in-person meeting, the representative should be permitted to participate in the discussion via Zoom, Teams, or conference call.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PRECONSTRUCTION CONFERENCE (SAFETY)- POLICY & PROCEDURE

D. MEETING AGENDA (SAFETY)

At a minimum, the following topics should be covered during the PRE-CON meeting. This includes but is not limited to the following.

- Regulatory Agency Jurisdiction (OSHA/1926 and or NAVFAC/EM 385)
- NCDOL Consultative Services Involvement
- Safety Training Requirements (equipment operation, fall protection, ladder, etc.)
- Hazardous Communication (SDS)
- Orientation Procedures
- Weekly Safety Meetings
- AHA (if applicable)
- General required PPE
- Daily Clean-up
- Material Storage
- Competent person (supervision)
- Tiered Subcontractors
- Equipment & Safe Operation (cranes, excavators, back-hoe, scissor lift, boom lift, etc.)
- Temporary Electrical
- Fall Protection
- Ladder Safety
- Trenching/Excavation
- Identified or Possible Confined Space Situations
- First Aid Requirements
- Emergency Action Plan
- Fire Prevention (equipment & hot work)
- Scaffolding Erection and Dismantling (bakers scaffolding)
- Crystalline Silica
- Disciplinary Actions

NOTE meeting minutes should be recorded

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PRE-INSTALLATION MEETINGS (SAFETY)- POLICY & PROCEDURE

PRE-INSTALLATION MEETINGS (SAFETY)- POLICY & PROCEDURE

Revision Date- 9/26/2024

ACRONYMS

CAZ- Controlled Access Zone
D&D- Daniels and Daniels
DFOW- Definable Feature of Work
GC- General Contractor
NCCO- North Carolina Crane Operator License
PE- Project Engineer
PM- Project Manager
QCM- Quality Control Manager
SDS- Safety Data Sheet
SHD- Safety & Health Director
SSHO- Site Safety & Health Officer

A. PURPOSE

This procedure establishes guidelines for conducting Pre-Installation Meetings, also known as Preparatory Meetings. These meetings review the installation process, project requirements, safety protocols, and site-specific concerns before starting a DFOW. The focus is ensuring safety, efficiency, and preparedness for all personnel and activities involved.

B. SCHEDULING & LOCATION

- **Scheduling:** The Project Superintendent or QCM schedules the Pre-Installation Meeting at least two weeks before any DFOW begins.
- **Location:** Meetings should be held on the project site.

C. ATTENDEES

Required D&D Representation:

- Safety & Health Director
- Superintendent
- Quality Control Manager (if applicable)
- Site Safety & Health Officer (if applicable)
- Project Manager
- Project Engineer (if applicable)

Contractor Representation:

- Contractor's PM
- Superintendent
- Foreman

Note: Architects, designers, owners, vendors, government officials, and inspectors may also be required depending on the project scope.

D. MEETING AGENDA (SAFETY)

The following items should be reviewed during the Pre-Installation Meeting. Not all sections will apply to every contractor or project, so only relevant sections should be discussed.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PRE-INSTALLATION MEETINGS (SAFETY)- POLICY & PROCEDURE

1. Personal Protective Equipment

- Review general project PPE requirements (e.g., hard hats, safety glasses, gloves, etc.) and any specialty PPE (e.g., respirators, fall protection) necessary for specific tasks.
- Verify that contractors will provide proper PPE for their workforce.

2. Scope of Work

- Discuss the overall scope, with attention to safety-related concerns, existing site hazards, and anticipated hazards during construction. Review hazard abatement strategies.

3. Clean-up Requirements

- Set expectations for daily clean-up, debris separation, and the location of waste containers. Reinforce contractor responsibility for site cleanliness.

4. Labor & Supervision

- Ensure the contractor's workforce is sufficient to meet safety and productivity standards. Verify that competent supervision will be present on-site throughout the project.

5. Tools & Equipment

- Review the hand tools, power tools, and equipment contractors will use (e.g., cranes, aerial lifts, scaffolding). Ensure personnel have been trained in their safe operation and that daily inspections will be conducted.

6. Specialty PPE & Programs

- Confirm using any specialty PPE, including fall protection and respirators. Review training documentation and written programs for these items.
- Discuss fall protection inspection protocols and rescue plans. Confirm the contractor's respiratory protection program and medical evaluations for workers using respirators.

7. Trenching & Excavation

- Review trench safety equipment and practices, including trench boxes, shoring, or CAZ. Ensure that atmospheric testing will be conducted for trenches >4 feet deep.
- Discuss the competent person's role in monitoring trench safety and responding to trench instability or hazards.

8. Cranes, Rigging, and Signaling

- Confirm crane operator certification (NCCCO), annual inspections, and lift plans. Discuss daily cranes and rigging equipment inspections, and ensure only qualified riggers and signalers are involved in lifting operations.

9. Ladders

- Verify that contractors have received ladder safety training. Ensure daily ladder inspections, proper ladder setup (e.g., extension ladders secured at a 4:1 ratio), and that weight limits will not be exceeded.

10. Confined Spaces

- Identify confined spaces and ensure entry follows permit-required confined space protocols, including atmospheric testing, ventilation, and rescue plans.

11. Respiratory Silica

- Review the contractor's written plan for respirable crystalline silica. Ensure all concrete cutting and drilling uses tools with HEPA filters or integrated water delivery systems.

12. HAZCOM/SDS

- Confirm that contractors are trained in hazard communication and have accessible Safety Data Sheets (SDS) for all materials. Based on SDS recommendations, verify PPE compliance.

E. ROLES AND RESPONSIBILITIES

1. D&D Personnel

- **SHD:** Ensure that safety protocols and PPE requirements are communicated and followed.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
PRE-INSTALLATION MEETINGS (SAFETY)- POLICY & PROCEDURE

- **Superintendent:** Lead the coordination of site-specific concerns and enforce compliance.
- **QCM:** Oversee quality control aspects, ensuring work meets standards.
- **SSHO:** Monitor site-specific safety concerns and ensure hazard mitigation strategies are in place.
- **PM:** Ensure all elements of the pre-installation meeting are carried out and documented.
- **PE:** Provide technical insight into the installation process when required.

2. Contractor

- **PM/Superintendent/Foreman:** Ensure all work complies with D&D and project safety and quality standards. Provide adequate supervision, tools, and equipment to complete tasks safely.

Summary

The Pre-Installation Meeting ensures that all stakeholders are aligned before starting any DFOW. It comprehensively reviews the project's scope, safety requirements, and labor considerations. By adhering to this procedure, D&D ensures effective communication, hazard mitigation, and overall project success.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FLEET SAFETY- POLICY & PROCEDURE

FLEET SAFETY- POLICY & PROCEDURE

Revision Date- 9/26/2024

ACRONYMS

CDL – Commercial Driver’s License
COB – Close of Business
D&D – Daniels and Daniels Construction Company
DOT – Department of Transportation
FMCSA – Federal Motor Carrier Safety Administration
OSHA – Occupational Safety and Health Administration
POV – Personal Owned Vehicle
P&P – Policy and Procedure

A. PURPOSE

This policy outlines the minimum safety requirements for operating vehicles on company business to ensure a safe work environment for employees and the public. Driving a company vehicle is a privilege governed by company policies. All employees must adhere to these policies to foster a safe driving culture and protect D&D’s assets and reputation.

B. APPLICABILITY

This policy applies to all D&D employees operating company vehicles.

C. DRIVER ASSESSMENT

To ensure eligibility for operating company vehicles:

- **Initial Check:** D&D and its insurance provider will pull a driving report to assess the employee’s eligibility.
- **Annual Check:** The D&D insurance provider will review company vehicle employees yearly.
- **Ongoing Requirements:** Additional assessments and defensive driver training may be required depending on driving history.

D. PROHIBITED ACTIONS

Drivers must avoid the following actions, which may result in the revocation of driving privileges:

- **Distracted Driving:** Using electronic devices, eating, drinking, or grooming while driving.
- **Impaired Driving:** Driving under the influence of alcohol, cannabis, drugs (including prescribed/OTC medication), or while fatigued.
- **Aggressive or Reckless Driving:** Speeding, tailgating, illegal maneuvers, or retaliatory driving.
- **Non-compliance:** Failure to adhere to traffic laws, site-specific speed limits, or company safety rules.
- **Unauthorized Passengers:** Transporting individuals not affiliated with D&D without authorization.
- **Improper Vehicle Use:** Using company vehicles for non-business purposes, towing unauthorized trailers, or carrying hazardous materials.
- **Cargo Management:** Failing to secure cargo per regulatory standards.
- **Felonies:** Engaging in criminal activity while operating a company vehicle.

E. CELL PHONE POLICY

- **Prohibited Use:** Handheld electronic devices are prohibited while driving.
- **Hands-Free Use:** Drivers may use hands-free devices if available; incoming calls should be

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FLEET SAFETY- POLICY & PROCEDURE

directed to voicemail.

- **Texting and Messaging:** Reading or responding to texts and emails while driving is strictly prohibited.

F. DRUG & ALCOHOL USE

Operating a vehicle under the influence of drugs or alcohol is strictly prohibited. CDL drivers must adhere to all DOT and FMCSA regulations. Prescription or over-the-counter drugs impairing driving abilities are also prohibited. Refer to the company drug policy for further details.

G. SEATBELT USAGE

Drivers and all passengers must wear seatbelts while the vehicle is in motion. Drivers are responsible for ensuring all passengers comply with seatbelt regulations.

H. LICENSE REQUIREMENTS

Employees must hold a valid U.S. driver's license with necessary endorsements when operating vehicles on company business. Drivers must provide their license upon request by supervisors or law enforcement.

I. COMPANY-OWNED VEHICLES

- **Authorization:** Only authorized employees who meet D&D's driver eligibility criteria may operate company vehicles.
- **Personal Use:** Vehicles assigned for commuting must not be used for personal activities, including ridesharing or deliveries.
- **Commercial Vehicles:** Only licensed and authorized employees may operate commercial vehicles per DOT standards.
- **Responsibility:** Drivers are accountable for the care and operation of assigned vehicles. Unauthorized use or modifications are strictly prohibited.

J. COOPERATION WITH AUTHORITIES

Drivers must cooperate with law enforcement and company management during traffic stops, inspections, or after incidents involving company vehicles.

K. ASSISTANCE TO OTHER MOTORISTS

Drivers should not assist disabled motorists or collision victims beyond their expertise. Instead, they are encouraged to notify appropriate authorities.

L. REPORTING ACCIDENTS & VIOLATIONS

- **Collisions:** Report any crash involving a company vehicle within 24 hours.
- **License Suspensions:** Report any license suspension or revocation to executive management immediately.
- **Violations:** Report moving violations by COB on the day of the offense, with serious violations reported immediately.

M. COMPANY & PERSONAL PROPERTY

Employees are responsible for safeguarding company property (e.g., computers, tools) in company vehicles. D&D is not liable for personal property theft from company vehicles.

N. DEFENSIVE DRIVING

Drivers must follow defensive driving principles:

- **Constant Awareness:** Monitor traffic, communicate intentions, and maintain a safe distance.

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FLEET SAFETY- POLICY & PROCEDURE

- **Adherence to Laws:** Follow posted speed limits and adjust for road, weather, or traffic conditions.
- **Proactive Measures:** Anticipate hazards, use brakes and signals appropriately, and scan 15-20 seconds ahead.

O. INSPECTION & MAINTENANCE

Drivers must ensure that their assigned vehicles are appropriately maintained and operate safely. All vehicle inspections, registrations, and insurance certifications must be current.

ROLES AND RESPONSIBILITIES

Drivers: Ensure safe vehicle operation, traffic law adherence, and company policy compliance.

Supervisors: Monitor driving compliance, complete assessments, and address safety violations.

Executive Management: Authorize vehicle assignments, approve driving privileges, and handle serious infractions.

SUMMARY

Initial Driver Eligibility: The employee's driving record is assessed before assigning a vehicle.

Annual Review: Ongoing eligibility is confirmed through annual driving record checks.

Reporting Incidents: Accidents and violations must be reported promptly.

Vehicle Use: Employees may only use vehicles for company business and must follow all outlined safety practices.

Enforcement: Violations of this policy may result in disciplinary action, including termination.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
COMPANY VEHICLE MAINTENANCE- POLICY & PROCEDURE

COMPANY VEHICLE MAINTENANCE- POLICY & PROCEDURE

Revision Date- 9/27/2024

ACRONYMS

D&D – Daniels and Daniels

O&M – Operation & Maintenance

A. PURPOSE

This plan establishes guidelines and minimum requirements for maintaining D&D company vehicles. Company vehicles represent a significant investment, and routine preventive maintenance is essential to ensure their longevity and safe operation. Proper maintenance extends the service life of vehicles and safeguards drivers, other motorists, and pedestrians.

B. MAINTENANCE SCHEDULE

All company vehicles should be maintained according to the manufacturer's recommendations unless directed otherwise by D&D management or the Equipment Manager. This information is typically available in the vehicle's Operation and maintenance (O&M) or owner's manuals.

D&D Vehicle Maintenance Criteria:

- Oil Change: Every 5,000 miles
- Tire Rotation: Every 10,000 miles
- Alignment: As required
- Exterior/Interior Cleaning: At least once per month, or more frequently if needed

Identifying Maintenance Issues:

Any deficiency noted by the authorized user or identified on the monthly vehicle inspection report should be documented, reported, and addressed promptly. If a deficiency impacts the vehicle's safe operation, the vehicle should not be used until the issue is resolved. Depending on the severity of the problem, vehicles may be taken out of service.

- Examples of Deficiencies:
- Low tire pressure
- Broken seat belts or mirrors
- Cracked or soiled glass
- Non-functioning horn or lights
- Fluid leaks or braking issues

C. DOCUMENTATION AND REPORTING

Deficiencies should be identified during the monthly vehicle inspection or as they arise. All issues should be recorded on the Monthly Vehicle Inspection Report.

After identifying a maintenance issue, the authorized user must notify the Equipment Manager immediately via phone and email. In cases where multiple users operate the exact vehicle, the individual using the vehicle at the inspection must complete and submit the report. All authorized users should be informed if a vehicle is taken out of service due to safety concerns. All maintenance issues should be resolved promptly, and the Equipment Manager must ensure timely corrective actions.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
COMPANY VEHICLE MAINTENANCE- POLICY & PROCEDURE

D. LOCKOUT-TAGOUT PROCEDURES

If a maintenance issue compromises vehicle safety, the following Lockout-Tagout (LOTO) procedures must be followed:

Lockout: Remove the key from the ignition.

Tagout: Attach a "Do Not Operate" or "Unsafe for Use" tag to the steering wheel or another prominent location.

Include the name and contact information of the person responsible for the lockout and a description of the issue. Notify all authorized users of the vehicle's condition and ensure no one operates it until repairs are complete.

E. PROPER MAINTENANCE REQUIREMENTS

All vehicle maintenance should follow the manufacturer's recommendations. Any repairs should restore the vehicle to its original condition without modifications.

Only the Equipment Manager or an authorized mechanic shop may perform significant or complex repairs. The authorized user may handle minor tasks such as adjusting tire pressure or replacing burned-out bulbs, but only with approval from the Equipment Manager.

F. VEHICLE CLEANLINESS

The authorized user is responsible for maintaining the cleanliness of their assigned vehicle. Vehicles should be cleaned at least once per month, or more frequently if necessary, to uphold D&D's professional image.

Cleaning Guidelines:

Exterior: To avoid impaired visibility, ensure the windows, headlights, and taillights are debris-free. Remove any heavy soiling from the vehicle.

Truck Bed: Clear debris that could blow out while driving. If necessary, secure items in the truck bed using bungee straps, ratchet straps, or rope.

Interior: Vacuum and clean the interior, ensuring windows and instrument clusters are dirt-free. Keep the cab clear of obstructions that may impede the driver's view or pose a hazard in the event of an accident.

G. ROLES AND RESPONSIBILITIES

Authorized Vehicle Users

- Conduct monthly vehicle inspections.
- Report deficiencies immediately to the Equipment Manager.
- Maintain vehicle cleanliness and perform minor maintenance tasks as needed.
- Notify all users of safety-related vehicle lockouts.

Equipment Manager

- Oversee vehicle maintenance scheduling and ensure repairs are completed promptly.
- Maintain records of maintenance reports and ensure compliance with preventive maintenance schedules.
- Manage the Lockout-Tagout process and authorize all repairs.

SUMMARY

Vehicle Inspections: Conduct monthly inspections and document any deficiencies.

Maintenance Reporting: Notify the Equipment Manager immediately of any issues.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
COMPANY VEHICLE MAINTENANCE- POLICY & PROCEDURE

Maintenance Scheduling: Perform preventive maintenance (oil changes, tire rotations) at specified intervals.

LOTO Procedure: Lock out vehicles with safety deficiencies until repairs are made.

Cleaning: Ensure vehicles are cleaned inside and out at least once a month.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
LOSS PREVENTION & ASSET PROCUREMENT- POLICY & PROCEDURE

LOSS PREVENTION & ASSET PROCUREMENT- POLICY & PROCEDURE

Revision Date- 9/27/2024

ACRONYMS

D&D – Daniels & Daniels

SHD – Safety and Health Director

A. PURPOSE

This plan outlines D&D's procedures for managing, procuring, using, and transferring company assets, including tools, equipment, vehicles, and materials. It aims to safeguard these assets from loss, misuse, or damage.

B. POLICY

D&D's policy is to protect company assets from loss and damage due to misuse or abuse. Every employee is responsible for safeguarding company assets regardless of their role.

C. GENERAL GUIDELINES

The following guidelines are designed to ensure company assets' consistent and efficient management, from procurement to retirement.

D. PROCUREMENT OF ASSETS

Asset Availability Check: The company's asset database must be reviewed to determine availability before acquiring a new asset.

Asset Purchase: If the asset is unavailable, the equipment manager should initiate procurement. Prior approval from Executive Management may be required for high-value assets.

Asset Registration: Upon purchase, each asset should be assigned a unique D&D reference number and logged into the asset database, including details such as make, model, serial number, and price.

E. TRANSFER OF COMPANY ASSETS

Transfer Procedures:

- **Responsibility:** Until the Equipment Manager logs an asset transfer, the original employee to whom the asset was assigned remains fully responsible.
- **Office Transfers:** Employees requesting assets must notify the Equipment Manager 24 hours before. The asset will then be assigned to them and logged into the database.
- **Field Transfers:** Every effort should be made to transfer assets at the office. If this is not possible, the Equipment Manager must be notified, and the transfer should be documented in the database. The original employee remains responsible until the transfer is officially logged.

F. REPORTING LOST OR STOLEN ASSETS

When reporting a lost, stolen, or broken asset, the following information should be provided to the **Equipment Manager:**

- Make, model, serial number, and D&D reference number
- Time and date when the asset was last seen
- Name of the last person to use the asset
- Location where the asset was last seen or used
- File a police report for stolen assets

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
LOSS PREVENTION & ASSET PROCUREMENT- POLICY & PROCEDURE

G. REPORTING ASSET MISUSE OR ABUSE

In case of asset misuse or abuse, report the following details:

- Nomenclature, make, model, and serial number (if available)
- Name of the personnel responsible for using the asset
- Description of actions that qualify as misuse or abuse
- Time and location of the incident

H. CONTACTS FOR REPORTING

Lost, stolen, or broken assets: Notify the Equipment Manager immediately.

Misuse or unsafe operation of assets: Contact the SHD promptly.

Note: Immediate notification is required when a company asset is stolen, lost, misused, or abused.

I. RETIREMENT OF COMPANY ASSETS

When assets are broken, outdated, or missing components, they should be returned to the Equipment Manager. Upon return of the asset (or its remnants), the employee will be relieved of responsibility, and the asset will be marked as retired in the database.

J. ROLES AND RESPONSIBILITIES

Employees:

- Safeguard assigned assets.
- Report any loss, damage, misuse, or theft of assets promptly.
- Ensure proper transfers are completed with the Equipment Manager.

Equipment Manager:

- Manage asset procurement, transfer, and retirement processes.
- Maintain the asset database with accurate records of all assets.
- Authorize asset transfers and ensure timely reporting of lost, stolen, or broken assets.

SHD:

- Handle reports of asset misuse, abuse, or unsafe operation.

SUMMARY

Asset Procurement: Verify availability, log new purchases, and assign reference numbers.

Asset Transfer: Complete formal transfers through the Equipment Manager to ensure accountability.

Lost/Stolen Asset Reporting: Report immediately, providing relevant details, and file a police report if necessary.

Misuse/Abuse Reporting: Report incidents to the SHD with specific details about the misuse or abuse.

Asset Retirement: Return broken or outdated assets to the Equipment Manager for proper documentation and removal from the database.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
RECORDKEEPING- POLICY & PROCEDURE

RECORDKEEPING PROCEDURES

Revision Date- 9/27/2024

ACRONYMS

BOD – Beneficial Occupancy Date

D&D – Daniels and Daniels Construction

NCDOL – North Carolina Department of Labor

OSHA – Occupational Safety and Health Administration

SHARP – Safety and Health Achievement Recognition Program

SHD – Safety and Health Director

A. PURPOSE

This document outlines the criteria for identifying, storing, and maintaining records essential for legal compliance and internal review. It includes document types, locations, retention periods, and responsible personnel for record-keeping at Daniels and Daniels Construction (D&D).

B. DOCUMENTATION REQUIREMENTS

Training Documentation:

- Certifications, Course Agendas, Sign-in Rosters, Student Exams, Instructor Evaluation Reports

Regulatory Reports:

- NCDOL Consultative Survey & SHARP Reports
- OSHA 300A Logs

Project Documents:

- Daily Reports
- Toolbox Meeting Records
- SHD Field Inspection Reports
- Vehicle, Equipment, or Property Damage Incident/Accident Reports
- Injury/Illness Reports
- Near-Miss Reports
- Confined Space Permits

Health and Safety Documents:

- Employee Medical Evaluations & Fit Testing Reports
- Employee Exposure Reports

Equipment Documentation:

- Equipment Inspection Checklists
- Fall Protection Inspections

Subcontractor Documentation:

- Subcontractor Certifications

Project Records:

- Project Orientation Documents
- Project Meeting Minutes

C. DOCUMENT STORAGE & RETENTION

Training Certifications:

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
RECORDKEEPING- POLICY & PROCEDURE

Stored on the D&D server: G DRIVE/SAFETY & HEALTH DEPARTMENT/TRAINING/TRAINING DOCUMENTATION/TRAINING CERTIFICATES LOG

Retention: Until expiration or one year post-termination.

Course-Related Documents (Agenda, Roster, Exams, Evaluation):

Stored physically in the SHD office filing cabinet.

Retention: 5 years after certification expiration.

NCDOL Reports:

Stored on the server: G DRIVE/SAFETY & HEALTH DEPARTMENT/NCDOL CONSULTATIVE SERVICES/VISIT DOCUMENTATION/PROJECT NAME.

Subfolders by visit date for SHARP projects.

Retention: Indefinite.

OSHA 300A Logs:

Stored on the server: G DRIVE/SAFETY & HEALTH DEPARTMENT/OSHA 300A.

Retention: Indefinite.

Daily Reports:

Stored on PROCORE:

Retention: Indefinite.

Toolbox Meetings:

Stored on PROCORE: PROJECT NAME/DOCUMENTS/SAFETY/WEEKLY TOOLBOX MEETINGS.

Retention: Indefinite.

SHD Inspection Reports:

Stored on PROCORE: PROJECT NAME/PROJECT TOOLS/PROJECT MANAGEMENT/SAFETY DIRECTOR INSPECTION.

Retention: Indefinite.

Incident/Accident Reports (Vehicle, Equipment, Injury, Property Damage):

Stored on PROCORE:

Retention: Indefinite.

Employee Medical Evaluations & Fit Testing:

Stored on the server: G DRIVE/SAFETY & HEALTH DEPARTMENT/EMPLOYEE MEDICAL EVALUATIONS.

Retention: One year post-termination.

Employee Exposure Reports:

Stored on the server: G DRIVE/SAFETY & HEALTH DEPARTMENT/EMPLOYEE EXPOSURE REPORTS.

Retention: Indefinite.

Confined Space Permits:

Stored on PROCORE: PROJECT NAME/DOCUMENTS/SAFETY/CONFINED SPACE PERMITS.

Retention: Indefinite.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
RECORDKEEPING- POLICY & PROCEDURE

Equipment Inspection Checklists:

Stored on-site for the project duration.

Retention: Until project completion.

Fall Protection Inspections:

Stored on the server: G DRIVE/SAFETY & HEALTH DEPARTMENT/FALL PROTECTION EQUIPMENT.

Retention: Indefinite or until equipment is retired.

Project Orientation Documentation:

Stored on-site until project completion.

Retention: Until project closeout.

Subcontractor Certifications:

Stored on-site until project completion.

Retention: Until project closeout.

Project Meeting Minutes:

Stored on-site until project completion.

Retention: Until project closeout.

D. ROLES AND RESPONSIBILITIES

Safety & Health Director (SHD):

- Responsible for organizing, storing, and retaining all safety-related documents, including SHD Field Reports, NCDOL Reports, and exposure records.

Project Team:

- Ensure timely completion and submission of daily reports, accident reports, and confined space permits. Coordinate with SHD for record maintenance.

Employees & Subcontractors:

- Provide necessary certifications and exposure testing results. Comply with training requirements and document submission timelines.

SUMMARY

The record-keeping procedure ensures compliance with legal and internal standards for D&D. Documents are categorized into training, safety, equipment, and project-related groups, with precise storage locations and retention timelines. Each document has designated responsibilities for creation, submission, and storage, emphasizing safety and compliance at all project stages.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
DISCIPLINARY ACTION FOR VIOLATION & FAILURE TO REPORT (EMPLOYEE) - POLICY & PROCEDURE

DISCIPLINARY ACTION FOR VIOLATION & FAILURE TO REPORT (EMPLOYEE)
Revision Date- 9/27/2024

ACRONYMS

D&D- Daniels and Daniels

OSHA- Occupational Safety and Health Administration

SHD- Safety & Health Director

EM 385- US Army Corps of Engineers Safety and Health Requirements Manual

A. PURPOSE

This policy establishes the course of disciplinary action against employees who violate any Daniels and Daniels (D&D) policies, OSHA regulations, EM 385 standards, or other applicable safety and regulatory requirements not explicitly covered in this manual.

B. VIOLATIONS

Violations include any act of non-compliance with D&D policies, OSHA regulations, EM 385 standards, or other relevant standards. This includes, but is not limited to, unsafe work practices, neglect of duty, or failure to follow established safety protocols.

C. DISCIPLINARY PROCEDURE

For any violation, the following disciplinary steps apply, regardless of an employee's tenure or position:

Note: Certain severe violations—such as actions that endanger lives—may warrant immediate termination without following the standard three-step process.

1st Violation:

Written warning from the SHD or immediate supervisor.

Discussion of the violation and corrective actions to ensure future compliance.

2nd Violation:

Written warning from the SHD or immediate supervisor.

Formal meeting with the SHD and supervisor to review the violation and establish corrective measures.

3rd Violation:

Written warning from the SHD or immediate supervisor.

Formal meeting with D&D President, and Vice President.

Placement on a 90-day probationary period with specific terms for correction.

Possible termination of employment.

D. 90-DAY PROBATIONARY PERIOD

Employees placed on probation must not violate any D&D policy, OSHA regulation, or EM 385 standard during probation. Any violation within this timeframe will result in immediate termination.

E. VIOLATION RECORD DURATION

All violation records will be retained for the entire duration of the employee's tenure at D&D.

F. DISCIPLINARY ACTION FOR FAILURE TO REPORT INCIDENTS & ACCIDENTS

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
DISCIPLINARY ACTION FOR VIOLATION & FAILURE TO REPORT (EMPLOYEE) - POLICY & PROCEDURE

This section outlines disciplinary measures for employees who fail to report incidents or accidents accurately and promptly.

G. REPORTABLE INCIDENTS & ACCIDENTS

Incidents and accidents required to be reported include, but are not limited to:

- Damage to D&D or rented equipment, vehicles, or property.
- Damage to customer equipment, vehicles, or property.
- Injuries or illnesses involving D&D employees, subcontractors, customers, or the public.
- Any near miss, unsafe condition, or uncorrected safety violation.
- Loss of life or severe injury.
- Any form of harassment or abuse (verbal, physical, or sexual).

H. DISCIPLINARY ACTION FOR FAILURE TO REPORT

Failure to report incidents or accidents as outlined above may result in the following disciplinary measures:

Equipment/Vehicle Damage: Failure to report damage to D&D equipment or vehicles will result in a written notice of violation. The employee may lose equipment operation or driving privileges, potentially indefinitely.

Property Damage: Failure to report damage to D&D, customer, or public property may result in a written notice or termination, depending on the severity and cost of the damage.

Injury/Illness: Failure to report a job-related injury or illness, whether personal or involving others, will result in a written notice of violation. Delayed reporting may also affect access to medical treatment and workers' compensation benefits.

Hazardous Conditions: Failure to report of dangerous conditions that could lead to severe injury or loss of life will result in a written notice. Depending on the severity and exposure risk, termination may follow.

Harassment/Abuse: Failure to report verbal, physical, or sexual harassment or abuse will result in a written notice. Depending on the nature of the offense, the employee may be terminated.

Fatalities/Severe Injuries: Failure to report incidents involving loss of life or life-threatening injury will result in immediate termination.

H. ROLES AND RESPONSIBILITIES

Employees: Responsible for following all D&D policies, reporting violations, and adhering to safety standards

Supervisors: Responsible for enforcing disciplinary procedures, issuing written warnings, and ensuring corrective actions are taken.

Safety & Health Director (SHD): This person oversees the disciplinary process, participates in meetings, and ensures compliance with safety regulations.

D&D Leadership (President, Vice President): Involved in disciplinary discussions for repeated violations and ultimate decision-making in severe cases.

SUMMARY

This policy establishes a progressive disciplinary system for D&D safety and procedural standards violations. Based on the severity and frequency of violations, employees are subject to written warnings, probation, and potential termination. Immediate termination may occur for severe infractions that endanger lives or cause significant harm.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FIRE PREVENTION AND CONTROL PROGRAM- POLICY & PROCEDURE

FIRE PREVENTION AND CONTROL- POLICY & PROCEDURE

Revision Date- 9/27/2024

ACRONYMS

D&D- Daniels & Daniels

EAP- Emergency Action Plan

NFPA- National Fire Protection Association

CFR- Code of Federal Regulations

A. PURPOSE

This policy aims to preserve life and property by mitigating fire hazards at construction sites. Fires pose significant risks to workers and can lead to severe structural damage, loss of equipment, and project delays. The potential for fire loss is notably higher during construction due to ongoing hazards and incomplete fire protection systems.

B. APPLICABILITY

This fire prevention and protection policy applies to all D&D projects, regardless of their size, complexity, or type of construction operations.

C. POLICY

Fire protection measures must be implemented as soon as construction operations commence. This policy is integral to the overall project safety program and should be followed throughout construction.

D. REFERENCES

- National Safety Council - Data, Fire Prevention on Construction Sites
- NCDOL - Fire Prevention Plans
- CFR 29 1926.150 - Fire Protection and Prevention

E. ROLES AND RESPONSIBILITIES

Management: Ensure compliance with fire safety regulations, provide necessary training and resources, and oversee implementation of fire protection measures.

Supervisors: Monitor adherence to fire safety practices, conduct regular inspections, and ensure proper documentation of fire prevention measures.

Employees: Follow fire safety procedures, report hazards, participate in training, and adhere to all fire prevention policies.

F. FIRE HAZARD IDENTIFICATION

Hot work, combustible materials, and flammable liquids: Identify and evaluate fire-producing activities and materials before construction begins—document findings in the pre-construction safety survey.

Coordination with outside agencies: Develop a site-specific EAP, notify local emergency services of construction plans, and ensure access to relevant information.

G. FIRE PREVENTION MEASURES

Combustible materials

Open yard storage:

- Prohibit smoking and open flames near combustible materials.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FIRE PREVENTION AND CONTROL PROGRAM- POLICY & PROCEDURE

- Maintain stacks or piles no above 20 feet with accessways at least 15 feet wide.
- Store no combustible materials within 10 feet of any building.
- Place a portable fire extinguisher rated at 2A within 100 feet of storage areas.

Indoor storage:

- Prohibit smoking and open flames.
- Ensure storage does not obstruct exits, and that materials are stored according to their fire characteristics.
- Maintain stability in piles and stacks; provide aisle space for firefighting equipment.
- Keep 36 inches between stored materials, sprinkler system deflectors, and fire door openings.
- Place a portable fire extinguisher rated at 2A within 100 feet of storage areas.

Housekeeping

- Regularly remove combustible refuse (e.g., scrap materials, packaging) and place it in approved waste containers.
- Keep work areas, exits, and passageways clear of debris.
- Store oily rags and hazardous waste in closed metal waste cans.
- Prohibit on-site burning unless authorized by D&D.

Woodworking

- Set up woodworking areas in remote locations when appropriate.
- Install dust-collecting apparatus for power equipment and regularly dispose of dust, scraps, and refuse.
- Prohibit smoking in woodworking areas.

Temporary heating

- Provide sufficient fresh air; use mechanical ventilation if necessary.
- Maintain clearance between temporary heating devices and combustible materials as outlined in applicable safety standards.
- Avoid placing heaters directly on combustible materials; use heat-insulating materials.
- Prohibit solid fuel salamanders in buildings and on scaffolds.

Temporary electrical equipment

- Install electrical wiring and equipment per CFR 29 1926 subpart K and the National Electrical Code (NFPA 70).
- Ensure conductors are adequate for the expected load and protected from physical damage.

Temporary structures

- Separate temporary offices and storage sheds from other structures.
- Ensure temporary structures are non-combustible or have a minimum 1-hour fire resistance rating.

Equipment maintenance

- Regularly inspect and maintain equipment, particularly gasoline or diesel-powered types.
- Keep fixed equipment clear of combustible materials.
- Maintain complete records of inspections and maintenance.

Smoking

- Prohibit smoking near hazardous operations and place "No Smoking" signs in hazardous areas.
- Provide suitable ash receptacles in designated smoking areas.

Cutting and welding

- Supervisors must complete a hot work permit, and a dedicated fire extinguisher must be available.
- Ensure all combustible materials are removed from the work area and provide a fire watch during and after hot work operations.

H. FLAMMABLE AND COMBUSTIBLE LIQUIDS

Indoor storage: Store flammable liquids in approved containers with legible signage prohibiting

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
FIRE PREVENTION AND CONTROL PROGRAM- POLICY & PROCEDURE

smoking/open flames. Limit storage to no more than 25 gallons outside approved cabinets.

Outdoor storage: Maintain a safe distance (20 feet) from buildings and clear access paths for fire control.

Service and refueling areas: Turn off motors during refueling and provide appropriate signage. A portable fire extinguisher must be within 75 feet.

I. EMERGENCY PROCEDURES

Evacuation: All employees must evacuate to the designated emergency rally point immediately.

Assembly and accounting: Employees should sign in daily, and supervisors must ensure all personnel are accounted for after an evacuation.

Emergency contact list: Display on safety boards at all project sites.

J. FIRE EXTINGUISHERS

Maintain a minimum of one 10LB ABC multi-purpose dry chemical fire extinguisher on all D&D project sites.

Train employees on the use of fire extinguishers, including the P.A.S.S. method:

P: Pull the pin

A: Aim at the base of the fire

S: Squeeze the handle

S: Sweep the nozzle side-to-side

K. TYPES OF FIRES

CLASS A: Common combustibles (wood, paper, fabric).

CLASS B: Flammable liquids and gases (gasoline, oil).

CLASS C: Electrical fires (live electrical equipment).

CLASS D: Combustible metals (magnesium, titanium).

CLASS K: Cooking fires (grease, oil).

L. CONSTRUCTION PRIORITY

- Establish a temporary or permanent water supply for firefighting equipment as soon as combustible materials accumulate.
- Maintain automatic sprinkler systems during construction and check control valves daily.
- Install standpipes with necessary connections and maintain firewalls and exit stairways throughout construction.
-

SUMMARY

- Identify and assess fire hazards in work areas before construction begins.
- Implement storage and housekeeping measures to minimize fire risks.
- Regularly inspect and maintain equipment for compliance with fire safety standards.
- Train all personnel on fire prevention practices and emergency procedures.
- Monitor and enforce adherence to fire safety regulations and protocols.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
SAFETY INSPECTIONS- D&D EMPLOYEES- POLICY & PROCEDURES

SAFETY INSPECTIONS- D&D EMPLOYEES

Revision Date- 9/27/2024

ACRONYMS

D&D- Daniels and Daniels

PM- Project Manager

SHD- Safety & Health Director

SSHO- Site Safety & Health Officer

A. PURPOSE

This procedure outlines the process for conducting and documenting field inspections by the Site Safety & Health Officer (SSHO), Superintendents, and Project Managers (PM) at Daniels and Daniels (D&D).

B. INSPECTION FREQUENCY

Inspections must occur at the following intervals:

- Beginning of the shift
- Mid-morning
- Before lunch
- After lunch
- End of the shift

The Superintendent is responsible for daily routine safety inspections, which can be conducted alongside production and quality control inspections. The PM should also conduct a safety inspection during site visits, integrating it with their regular walk-through inspections.

C. INSPECTION CRITERIA

The following criteria serve as a minimum standard for inspections:

1. Project Office Area:

- Cleanliness and organization
- Current SDS log
- OSHA 1926 and EM 385 documentation (if applicable)
- First aid kit and usage log
- Eye wash station and spill kit
- Deficiency tracking log
- Equipment inspection checklist
- Emergency action plan
- Site safety signage
- Safety board (labor posters, map, nearest hospital, and urgent care directions)
- OSHA 300 log
- Emergency contact numbers

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
SAFETY INSPECTIONS- D&D EMPLOYEES- POLICY & PROCEDURES

2. Project Site (Exterior):

- Cleanliness and organization
- Personnel wearing appropriate PPE
- Utilities located before trenching/excavating
- Trenches and excavations properly protected
- Unattended open manholes, hand holes, and pull boxes
- Safe operation of equipment
- Proper guarding of moving parts
- Aerial work platforms operated safely on level surfaces
- Personnel utilizing fall protection as required
- Fire extinguishers on all equipment
- Correct setup and use of ladders
- Safe proximity to overhead power lines
- Utilization of controlled access zones for steel erection, roofing, or masonry activities
- Protection of unprotected sides or edges
- Level, solid surface setup for cranes, and operator possesses a current NCCO license
- Current annual crane inspection
- Proper erection of scaffolding (complete, plumb, level on a solid foundation)
- Proper usage and condition of drop cords and tools

3. Project Site (Interior):

- Cleanliness and organization
- Personnel wearing appropriate PPE
- Unprotected floor openings or edges
- Safe operation of equipment
- Guarding moving parts of equipment and machines
- Aerial work platforms operated safely on level surfaces
- Personnel utilizing fall protection as required
- Fire extinguishers on all equipment
- Correct setup and use of ladders
- Controlled access zones for steel erection, roofing, or masonry activities
- Proper erection of scaffolding (complete, plumb, level on a solid foundation)
- Locking of wheels during use of narrow frame (bakers) scaffolding
- Proper usage and condition of drop cords and tools

D. DOCUMENTING INSPECTIONS

- **Military Projects:** Document all safety violations or unsafe conditions on the deficiency tracking log and the daily contractor production report under "Job Safety."
- **Non-Military Projects:** Document all safety violations or unsafe conditions on the D&D Daily Project Safety Inspection report on PROCORE.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
SAFETY INSPECTIONS- D&D EMPLOYEES- POLICY & PROCEDURES

E. CORRECTIVE ACTION

All unsafe conditions or violations identified during inspections must be corrected immediately or as soon as practicable, typically within 24 to 48 hours, depending on severity. Life-threatening conditions must be addressed immediately; if not possible, work should be suspended and the area barricaded until corrective action is taken.

F. ROLES AND RESPONSIBILITIES

- **SSHO:** Conducts inspections, documents findings, and oversees corrective actions.
- **SHD:** Conducts inspections, documents findings, and oversees corrective actions.
- **Superintendent:** Performs routine inspections, ensuring safety compliance on-site.
- **PM:** Conducts safety inspections during site visits, collaborating with SSHOs and Superintendents.

SUMMARY

This procedure outlines the systematic approach to conducting safety inspections on construction sites. It emphasizes the importance of routine inspections, detailed criteria for evaluating safety conditions, and clear documentation practices to ensure a safe working environment.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
WORKPLACE VIOLENCE- POLICY & PROCEDURE

WORKPLACE VIOLENCE
Revision Date -9/27/2024

ACRONYMS

D&D – Daniels and Daniels Construction Company
OSHA – Occupational Safety and Health Administration

A. PURPOSE

This policy provides Daniels and Daniels Construction Company (D&D) employees with guidance on maintaining a safe and violence-free workplace. Stressful situations, disgruntled individuals, and personal conflicts can lead to violence. Early identification of warning signs is the most effective way to prevent such incidents.

B. POLICY

D&D strictly prohibits any violent behavior or threats of violence—implied, direct, or intimidating—on company premises, project sites, or at company-sponsored events. Violations of this policy by employees or non-employees will result in disciplinary action, including potential termination and criminal prosecution. Retaliation against individuals who report violence or threats is also prohibited.

C. APPLICABILITY

This policy applies to all D&D employees, contractors, vendors, and visitors at any property owned or managed by D&D, including off-site company-sponsored events.

D. REFERENCES

- U.S. Department of Labor Workplace Violence Program (OSHA)

E. REPORTING PROCEDURE

1. Workplace Violence in Progress

Step 1: Call 9-1-1 if necessary.

Step 2: Notify your supervisor immediately.

Step 3: Ensure your safety and that of others without putting yourself in harm's way.

Step 4: If safe, attempt to diffuse the situation.

2. Post-Occurrence

Step 1: Call 9-1-1 to dispatch emergency responders.

Step 2: Notify your supervisor.

Step 3: Move to a safe location and wait for responders.

Step 4: Provide authorities with relevant details.

F. EARLY WARNING SIGNS OF WORKPLACE VIOLENCE

The presence of the following behaviors may indicate a risk of violence. These indicators do not guarantee violent behavior but should be monitored:

- **Attendance Issues:** Frequent absenteeism or tardiness.
- **Supervisor's Time Impact:** Requiring excessive counseling or supervision.
- **Decreased Productivity:** Frequent mistakes or missed deadlines.
- **Inconsistent Work Patterns:** Erratic performance or reactions to criticism.
- **Concentration Issues:** Difficulty focusing or recalling instructions.
- **Safety Concerns:** Neglecting personal or equipment safety.
- **Poor Hygiene:** Noticeable changes in personal grooming.

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
WORKPLACE VIOLENCE- POLICY & PROCEDURE

- **Unusual Behavior:** Inappropriate comments, threats, or throwing objects.
- **Substance Abuse:** Indications of drug or alcohol use.
- **Personal Stress:** Emotional distress, crying, or personal conflicts.
- **Refusal of Responsibility:** Constant excuses for errors.
- **Depression:** Low energy or despair.

G. ACTIVE SHOOTER PROCEDURE: RUN-HIDE-FIGHT

1. RUN (Escape if possible)

- Prioritize escaping the shooter.
- Leave belongings behind.
- Help others if you can, but do not wait if they hesitate.
- Call 9-1-1 once safe and provide details about the shooter.

2. HIDE (If escape is not possible)

- Find a location out of sight and stay quiet.
- Silence devices and block doors if possible.
- Avoid hiding in groups.
- Communicate silently with police if possible.
- Stay hidden until law enforcement gives the all-clear.

3. FIGHT (As a last resort)

- Use aggressive force against the shooter.
- Improvise weapons such as chairs or fire extinguishers.
- Aim to incapacitate the shooter.

H. AFTER THE INCIDENT

- Keep hands visible and empty when approached by law enforcement.
- Follow officers' commands; they are focused on neutralizing the threat.
- If possible, provide first aid to the injured until responders arrive.
- Turn unconscious individuals onto their sides (recovery Position) and keep them warm if spinal injury is not expected.
- Seek professional help for trauma recovery if needed.

I. ROLES AND RESPONSIBILITIES

Employees: Report any incidents or threats immediately. Maintain awareness of surroundings and potential warning signs.

Supervisors: Ensure employees follow this policy, investigate complaints, and provide appropriate support.

Management: Support the implementation of safety measures, investigate all reports, and take disciplinary actions as needed.

Emergency Responders: Manage violent situations and ensure the safety of all personnel.

SUMMARY

D&D is committed to a safe workplace by enforcing a zero-tolerance policy toward violence. Employees are responsible for reporting threats or incidents, and supervisors are tasked with maintaining a secure environment. The procedure outlines actions to take during and after workplace violence, focusing on prevention, response, and recovery.

END OF SECTION

DANIELS AND DANIELS CONSTRUCTION COMPANY, INC.
LASER SAFETY PROGRAM- POLICY & PROCEDURE

LASER SAFETY- POLICY & PROCEDURE

Revision Date 10/2/2024

ACRONYMS

EMI – Electromagnetic Interference

OSHA – Occupational Safety and Health Administration

P&P – Policy & Procedure

PPE – Personal Protective Equipment

A. PURPOSE

Laser hazards on construction sites are often overlooked despite the variety of lasers used by different trades during construction phases. This program aims to ensure all lasers are used safely and responsibly, preventing accidents and injuries while complying with regulatory requirements.

B. POLICY

We are committed to ensuring lasers' safe and responsible use on all job sites. Our policy mandates compliance with all relevant regulatory standards and manufacturers' requirements. All laser equipment will be inspected, maintained, and calibrated regularly to ensure safe operation. Our top priorities are the health and safety of our employees and all other stakeholders.

C. APPLICABILITY

This policy applies to all employees, contractors, subcontractors, vendors, visitors, or any other individuals who operate or are exposed to lasers on construction sites.

D. REFERENCES

- OSHA 1926 Subpart D – Occupational Health & Environmental Controls
- OSHA 1926.54 – Nonionizing Radiation
- ANSI Z136 Series – Laser Safety Standards

E. LASER PROGRAM COMPONENTS

1. Identification of Laser Hazards

- During pre-construction safety surveys, identify all laser types for on-site use and the personnel or contractors responsible for them.

2. Risk Assessment

Assess the classification of all lasers in use, ensuring proper precautions and control measures are in place according to the following laser classes:

- Class 1 & 1M: Safe under normal conditions.
- Class 2 & 2M: Safe for accidental exposure; caution with optical devices.
- Class 3R: Low hazard but potential risk with direct exposure.
- Class 3B: Moderate hazard; requires control measures and PPE.
- Class 4: High hazard with potential for severe injury, burns, and fire; strict controls and PPE are required.

F. POTENTIAL HAZARDS

Common hazards from laser use include:

- Eye Injury – Permanent eye damage from direct beam exposure.
- Skin Injury – Burns from high-powered lasers.
- Fire Risk – Potential for lasers to ignite materials.
- Smoke/Vapors – Fumes from laser operations may pose respiratory risks.

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- Electrical Hazards – Associated with high-voltage components in laser equipment.
- Electromagnetic Interference (EMI) – Lasers can disrupt electronic equipment.
- Reflected Beams – Reflections off surfaces can pose additional hazards.
- Explosive Materials – Risks of triggering reactions in volatile substances.
- Environmental Impact – Light pollution and regulatory concerns.

G. LASER SAFETY PROCEDURES

To ensure the safe use of lasers on construction sites, the following procedures must be implemented:

- **Training** – Provide laser safety training for all personnel.
- **Pre-Operation Checks** – Inspect laser equipment before each use.
- **PPE** – Use appropriate eye and skin protection based on laser classification.
- **Access Control** – Restrict access to laser-controlled areas to authorized personnel only.
- **Warning Signs** – Post appropriate warnings around laser use areas.
- **Alignment and Positioning** – Ensure proper alignment to minimize exposure risks.
- **Emergency Procedures** – Have clear procedures for accidents, including first aid for eye injuries.
- **Shutdown Procedures** – Power off and secure lasers when not in use.
- **Maintenance** – Regularly maintain and calibrate laser equipment, with records kept.
- **Communication** – Ensure clear communication of hazards and safety measures to all workers.

H. PERSONAL PROTECTIVE EQUIPMENT (PPE)

The proper selection and use of PPE is crucial for safe laser operations. This includes:

- Laser Safety Glasses/Goggles – Specific to the laser's wavelength.
- Face Shields – For high-risk operations.
- Full-Body Protection – Laser-resistant clothing for high-power lasers.
- Gloves – Laser-resistant gloves to protect hands.
- Barriers and Curtains – To block beams in high-exposure areas.

I. MAINTENANCE & REPLACEMENT OF PPE

- Inspection – Regularly check PPE for damage.
- Cleaning – Follow manufacturer guidelines for cleaning laser safety glasses.
- Replacement – Replace PPE showing signs of wear, damage, or outdated standards.

J. TRAINING

All personnel using or exposed to lasers must undergo laser safety training, including:

- Laser types, hazards, and classifications.
- Proper use of PPE.
- Emergency procedures for incidents involving laser exposure.
- Safe work practices, including laser alignment and access control.

K. ROLES & RESPONSIBILITIES

Management – Ensure compliance with laser safety protocols, provide necessary resources, and oversee training.

Supervisors – Conduct risk assessments, enforce safety procedures, and maintain laser equipment.

Laser Operators – Use lasers according to safety guidelines, report hazards, and wear appropriate PPE.

Safety Officers – Monitor compliance, conduct audits, and investigate laser-related incidents.

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SUMMARY

This Laser Safety Program outlines the safe use of lasers on construction sites, focusing on hazard identification, risk assessment, safety protocols, and PPE. Regular training, equipment maintenance, and enforcing safety procedures are essential to protect all workers from potential laser hazards.

END OF SECTION

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TOOL & EQUIPMENT OPERATION- POLICY & PROCEDURE

TOOL & EQUIPMENT OPERATION POLICY & PROCEDURE

Revision Date- 10/2/2024

ACRONYMS

D&D – Daniels & Daniels
MEWPS – Mobile Elevated Work Platforms
O&M – Operation & Maintenance
P&P – Policy & Procedures
PIT – Power Industrial Truck
PPE – Personal Protective Equipment
SHD – Safety & Health Director
SOP – Standard Operating Procedure
T&E – Tools & Equipment

A. PURPOSE

This Tools and Equipment (T&E) Operation Policy and Procedure (P&P) establishes guidelines for the safe and efficient use of T&E on Daniels & Daniels (D&D) project sites. It minimizes risks to personnel and property while maximizing productivity by ensuring consistent operations, safety, and employee well-being.

B. POLICY

All personnel required to operate T&E must undergo training on proper and safe use. Only trained and authorized personnel may operate T&E. All operators must review and adhere to the T&E manufacturers' O&M guidelines.

C. APPLICABILITY

This policy applies to all D&D employees, contractors, vendors, and visitors involved in any tasks requiring T&E use during construction, regardless of task duration. It governs all D&D project sites and home office locations.

D. REFERENCES

- CFR 29 1926 Subpart I - Tools Hand & Power
- CFR 29 1926 Subpart O - Motor Vehicles, Mechanized Equipment & Marine
- CFR 29 1910.178 - Powered Industrial Trucks
- D&D Safety & Health Program, Policies & Procedures

E. TRAINING & EDUCATION

Training is required for all employees handling or operating T&E, covering T&E-specific procedures, hazard identification, emergency protocols, and PPE usage. T&E classifications categorize training:

- Hand Tools
- Power Tools
- Earth-Moving Equipment
- Material Handling Equipment
- Powered Industrial Trucks (PIT)
- Mobile Elevated Work Platforms (MEWPS)

Refresher training reinforces safe practices and updates employees on procedural changes. Personnel should have access to O&M manuals, available in hard or electronic copies, for all T&E they operate.

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F. EQUIPMENT INSPECTION & MAINTENANCE

1. Company-Owned Equipment

The D&D Equipment Manager is responsible for maintaining company-owned T&E. Authorized operators must perform daily inspections and report any issues, including safety-related concerns, to the Equipment Manager and SHD.

2. Rental Equipment

Rental T&E must be inspected upon delivery. Any deficiencies must be corrected before possession. The authorized operator is responsible for daily inspections. Any defects must be reported to the rental company and addressed before the T&E is returned to service.

3. General Inspection Procedures

Follow manufacturer O&M guidelines for inspections, which vary based on T&E type.

G. PERSONAL PROTECTIVE EQUIPMENT (PPE)

PPE requirements vary depending on the specific T&E in use. General PPE includes:

- Hardhats
- Safety Glasses
- Earplugs
- Gloves
- Safety Boots
- High-Visibility Garments
- Based on the task, specialty PPE (e.g., fall protection, respiratory protection) may be required. See D&D Policy #7 for complete PPE requirements.

H. STANDARD OPERATING PROCEDURES (SOP)

Responsibilities:

- **Management:** Provide training, resources, and supervision to ensure compliance.
- **Supervisors:** Ensure employees follow training and procedures.
- **Employees:** Adhere to guidelines for the safe operation of T&E.

General Safety Guidelines:

- Inspect all tools/equipment for damage before use.
- Use tools for their intended purpose only.
- Always wear appropriate PPE.
- Keep the workspace clean and well-lit.
- Follow manufacturer guidelines from the O&M manual.

I. HAZARD IDENTIFICATION & RISK ASSESSMENT

Common hazards in T&E operation include:

- Mechanical Hazards (e.g., moving parts, flying debris)
- Electrical Hazards (e.g., live components, faulty wiring)
- Chemical Hazards (e.g., exposure to chemicals or fumes)
- Noise Hazards (e.g., loud equipment causing hearing damage)
- Ergonomic Hazards (e.g., repetitive motion injuries)
- Falling Objects
- Pinch Points and Caught-in Hazards
- Heat and Fire Hazards
- Manual Handling Hazards
- Environmental Hazards (e.g., extreme weather)

Proper identification, inspection, and safety measures are required to mitigate these risks.

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J. INCIDENT REPORTING & INVESTIGATION

For incident reporting and investigation procedures, refer to D&D Policy #10 (Employee Report of Hazards) and D&D Policy #11 (Accident & Near-Miss Investigation).

K. EMERGENCY PREPAREDNESS

In case of injury or accident, stop work and notify the SHD. Follow established emergency protocols and evacuate if necessary. For more information, see D&D Policy #8 (Medical Services), Policy #9 (Emergency Action Plan), and Policy #13 (Bloodborne Pathogens).

L. TOOLS & EQUIPMENT NOT OWNED OR RENTED BY D&D

Without explicit authorization, D&D personnel should not operate tools or equipment not owned or rented by D&D. Thorough consideration is required when operating third-party-owned T&E to ensure the safety and protection of company assets.

M. ROLES AND RESPONSIBILITIES

Management: Provide resources and ensure training is conducted.

Supervisors: Oversee compliance and report deficiencies.

Employees: Operate T&E safely and report issues.

SHD: Monitor compliance, conduct inspections, and respond to safety concerns.

SUMMARY

This program outlines the necessary training, inspection, and safety procedures for operating tools and equipment on D&D sites. Adherence to manufacturer guidelines, appropriate PPE usage, regular inspections, and hazard awareness are essential components of this program. Violations will be subject to disciplinary action, and emergency protocols must be followed for incidents or injuries.

END OF SECTION