



**SPIEKER**  
GENERAL CONTRACTORS

## **Statement of The Spieker Company Safety and Health Policy**

The Spieker Company considers safety and the prevention of accidents the most important phase of operations or administration. Accidents resulting in personal injury or damage to property and equipment represents needless waste and loss. The Spieker Company is sincerely interested in the safety of each and every employee. Therefore, it is our company policy to conduct all operations safely to prevent injuries to person and damage to property.

Safety is considered a top priority from design to construction operations. All reasonable and practical steps are taken to maintain a safe and healthy environment to minimize accidents and health hazards. All subcontractors and their employees are required to use adequate protective and corrective equipment to ensure safety on the job.

All supervisory employees are responsible for the prevention of accidents on work under their direct supervision and for the safety instruction of their employees. Each employee is expected to cooperate fully in helping to protect him and his fellow workers as outlined in the Occupational Safety and Health Act of 1970.

The objective of this policy is to safeguard people and property within The Spieker Company and all our construction sites. Our employee's continued safety will receive total support from management.

Aaron White  
President

11/1/2021

Date

Babette Burnett, CHST COSS COSM  
Director of Health and Safety

11/1/2021

Date



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**Safety and Health Program Organization**

All personnel, at all levels, have the right to be safe, have the responsibility to work safely, and have a duty to be involved in safety and health operations. The maintenance of safe working conditions is primarily an on-site responsibility. The following provides a brief description of the responsibility of each project member.

**A. Project Managers**

- Establish policies and procedures which will effectively control, eliminate, or protect employees from recognized hazards in the workplace.
- Provide financial resources to support approved policies.
- Ensure education, engineering and enforcement measures.

**B. The Safety Director**

- Guide project superintendents to ensure that safety procedures are carried out on all jobsites.
- Assist the on-site superintendents by providing training, educational literature, PPE and maintaining safety equipment on the job sites.
- Serve as a liaison person to outside agencies and subcontractors.
- Write and perform yearly reviews of all Safety and Health Policies.
- Ensure maintenance of records, reports and documents to comply with federal regulations.

**C. Project Superintendents**

- Supervision of all on-site activities and work directly with employees and subcontractors to ensure jobsite safety.
- Determine safety hazards analyses, perform regular, frequent inspections, and enforce corrective action.
- Establish good housekeeping work habits, the supervision to ensure all personal protective equipment and tools are being used properly, assigning only qualified personnel for hazardous tasks,
- Provide new employee training, when required to perform a specific task.
- Carrying out weekly Toolbox Meetings.
- Providing timely first aid treatment.
- Reporting all accidents, injuries and near misses to their project manager and The Spieker Company Safety Director.



- Report all suspected mental health issues and harassment to the Safety Director immediately. (See Appendix L for full Harassment Policy)

**D. Employees**

- Understand and comply with the safety policies and procedures.
- Report unsafe conditions to their superintendent or Safety Director.
- Recommend measures to improve safety.
- Use personal protective gear and equipment.
- Report all accidents or injuries.
- Cooperate with accident investigations.

**E. Subcontractors**

- Must provide a competent person (An OSHA "**competent person**" is defined as "one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them"). The competent person must be on-site when the subcontractor is performing work.
- Personnel is expected to understand and comply with this safety policy and all OSHA Regulations for their trade.
- Wear required personal protective equipment.
- Report any unsafe conditions, accidents and injuries to The Spieker Company superintendent immediately.

**A. Inspections, Hazard Identification, Assessment, and Controls**

Hazard Identification and elimination is not only an inherent responsibility of each superintendent and the safety director, but also requires employee and subcontractor involvement. As such, hazard evaluation and control shall be an ongoing concern for all. It is the responsibility of everyone to identify, report, and correct all possible hazards. Superintendents/subcontractors are required to complete a Pre-Task Hazard Analysis Form when work being performed is considered high risk or when the construction manager requires them to do so.

**Inspections:**

The Spieker Company has a procedure for conducting inspections of jobsites for compliance with health and safety rules. The purpose of the in-house inspection is to identify hazards and unsafe practices before they cause an injury or accident.

- The Safety Director will do periodic and frequent on-site inspections of all jobsites and shop facilities.

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- Project superintendents are to do daily visual inspections of their project.
- Project superintendent for the Spieker Company and subcontractors must do weekly documented site inspections. All documented inspections shall be made available to the Project Manager and Safety Director.

After completing jobsite inspections, the person completing the inspection will:

- Discuss findings with employees/person responsible for creating the condition.
- Send written Notification of Hazard to subcontractor/general contractor or employee. (Appendix S7.)
- Follow up on changes, corrections and other actions necessary.

### **Subcontractor Inspections:**

The safety inspection program is applicable to all subcontractors within The Spieker Companies project boundaries. The Superintendent and Safety Director will conduct all inspections to determine subcontractor performance and compliance with safety codes, standards and regulations. When a violation occurs, the subcontractor's superintendent will be notified and given a time frame in which corrective action must be taken. If violations are not corrected within the specified time, The Spieker Company will make the appropriate corrections and back charge the subcontractor in violation for the time and materials involved.

#### 1. Airborne Contaminates

Personnel and subcontractors are not to be exposed to unacceptable levels of airborne contaminants such as nuisance dust, silica gases, fumes, or fibers. When levels exceed acceptable levels as established by OSHA, respirators, ventilation, and exhaust systems must be in place prior to commencing work. Potentially hazardous contaminants include but are not limited to the following:

- Asbestos fibers
- Paints and finishes
- Chemical fumes and gases
- Dust-generation cause by drilling, grinding, other activities
- Welding operations
- Temperatures
- Silica (Appendix F3)
- Lead Program (Appendix F4)

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- Lead Lined Drywall Installation (Appendix F5)

All subcontractors must provide The Spieker Company with a copy of their Silica Program if their scope of work includes the disturbance of silica. A site-specific silica plan must be prepared and kept on site. Documents must be presented upon request.

Internal Combustible Engines-When internal combustible engines are used in an enclosed area a scrubber must be used to lower CO2 admissions. Superintendent/Subcontractor must also provide adequate ventilation and continuous air monitoring.

## **B. Non-Compliance**

The Spieker Company believes that most safety problems can be resolved through immediate notification of existing hazard. Under normal circumstances, verbal notification is usually adequate to resolve an existing hazard.

However, when no resolution is made or the violation continues, Safety Non-compliance will be issued to the subcontractor/employee in violation. The Non-compliance will specify the violation, refer to established codes, and a date for response and correction will be specified. In the event of serious hazards, work may be interrupted until the hazard has been corrected and/or employee may be immediately terminated. (Employees Appendix S6)

### **Minimum disciplinary actions for violations are:**

**First infraction** will result in a verbal warning and will be documented in the employees file. This is just verbal acknowledgment of the infraction and a reminder to do the job safely.

**Second infraction** will result in a written warning with full description of the violation. This warning will be documented with the employees file. This is a description of the infraction with exact details. Employees will be allowed to make comments and to sign that they have been informed of the infraction warning.

**Third infraction** will result in a second written warning with full description of the violation and disciplinary suspension. The length of the disciplinary suspension will be determined by the severity of the infraction. This written warning will be documented in the employees file and the employee will be required to attend safety training (on their own time) on the safety infraction. Employees will be allowed to make comments and to sign that they have been informed of their infraction and suspension terms. They will then be given a day and time to attend safety training.



**Fourth infraction** will result in long-term suspension up to termination.

(Discipline procedures for our Drug Free Workplace policy may found within in Appendix K).

### **C. Employee Training**

Training and education cannot be emphasized enough at The Spieker Company. Knowledge of safety rules supplemented by compliance is essential to safety. New hire training will be conducted for each new employee. New hire training will include but is not limited to the following:

- Drug Free Workplace
- Lockout/tagout procedures
- Equipment Safety procedures
- PPE including but not limited to The Spieker Company Respiratory Protection Program
- Fall hazards and fall protection
- Hazard Communication
- Bloodborne Pathogens
- General Safety Regulations & Health Policies

Subcontractors and The Spieker Company employees must complete a brief jobsite safety orientation prior to commencing work on any Spieker Company job site. Arrangements will be made for all personnel to receive safety education detailing their responsibilities. In addition, training should include:

- Explanation of jobsite rules and regulations.
- Brief overview of the project.
- Training, when necessary, in any existing special hazards or conditions.
- Location of Hazardous Communication Safety Data Sheets/First Aid Kit.
- Location of emergency plan including emergency phone numbers.

All supervisory personnel for both The Spieker Company and its subcontractors must have the following training:

- OSHA 30
- First Aid, CPR and Bloodborne Pathogens
- Accident investigation and reporting



#### **D. Toolbox Talks/Safety Huddles**

It is the responsibility of every Superintendent to conduct weekly Toolbox Meetings. This policy is not limited to Spieker Company personnel. All Spieker Company subcontractors are required to conduct Toolbox Meetings on a weekly basis and supply them to the Spieker Company Safety Director upon request.

The Toolbox Talks should be recorded on the Toolbox Talks meeting form. All employees present must sign the attendance log. Superintendent then must electronically submit them to Babette Burnett, CHST COSS COSM each week.

- Safety huddles will be held daily at the beginning of each shift.
- Safety huddles will be conducted by The Spieker Company/subcontractor superintendent.
- Work taking place that day and any relevant safety issues shall be discussed.
- JSA are to be gone over at this time.
- Employees are encouraged to ask questions.

#### **E. First Aid/CPR and AED**

The Spieker Company superintendent assesses the risk of each individual work site prior to the commencement of work. All sites where work is being performed will have no less than one **Qualified First Aid Responder**. First aid training is done per the **OSHA standard 29CFR1910.151**

-The Spieker Company requires that all Superintendents/subcontractor Superintendents be First Aid/CPR Certified. Every superintendent has also been extensively trained in Bloodborne Pathogens. (**Bloodborne Pathogens Exposure Control Plan, Appendix B**)

- Medical emergency phone numbers and job location address shall be posted at each job site. (Please see individual superintendents for location.)
- First Aid Kits shall be readily available as well as eye flush on each job site location. First aid kits and portable eyewash stations vary in size and location depending of the scope of work of individual job sites. (Please see individual superintendents for locations.)

Should a medical emergency occur, other than minor scrapes and bruises, follow the procedures below:

- Notify the superintendent immediately.

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- Follow the superintendent's directions.
- If no superintendent is available:
  - Remain calm
  - Determine the extent of the injury
  - If injury is minor, call your superintendent or Babette Burnett CHST COSS COSM/Safety Director at 419-392-6123.
  - Follow their instructions.
  - A superintendent or Babette Burnett, CHST COSS COSM must accompany all injured employees to the medical facility. At no time shall they be allowed to drive themselves.

## **Major injury Procedures**

- **Call 911**
- Speak clearly and slowly.
- Give exact location.
- Describe the injury.
- Give the number you are calling from.
- Do not hang up unless you are told to do so by the 911 operator.
- Instruct another employee to call superintendent or Babette Burnett CHST COSS COSM/Safety Director. If she is not available call the project manager for your job site.
- Do not perform First Aid/CPR if you are not qualified to do so. Ask if anyone present is qualified to perform CPR/First Aid.
- Instruct another employee to go to entrance and wait for emergency medical responders.
- Instruct another employee to locate the specific Safety Data Sheet if any chemical is involved in the injury. This must be provided to the emergency medical responders.

**For office and shop Emergency Plan please see Appendix C.** See the project superintendent for a job specific Emergency Action Plan.

## **Accident Reporting Procedures**

Accidents are to be reported immediately to Babette Burnett, CHST COSS COSM Safety Director. If Babette is unavailable, contact Aaron White at 419-872-7000.

- You must fill out an accident report and fax (419-872-7010) or hand deliver to Babette Burnett, CHST COSS COSM the same day as the accident.
- All individuals involved in the accident must be drug-tested the same day as the accident. No exceptions.



- Pictures must be taken of the scene of the accident. If superintendent is involved in the accident, he will assign another individual to do so. All photos of the accident scene must be given to Babette Burnett, CHST COSS COSM within 24 hours.
- All job lasting 1 year, or more must have an OSHA 300 log. All subcontractors will also be required to maintain a log on-site when at any point the company will be on the project for 1 full calendar year.

**All subcontractors** must report an injury to their Spieker Company Superintendent immediately. A written accident report must be submitted to The Spieker Company on the same day accident occurs.

The Spieker Company makes the health and wellness its top priority. Getting our employees back to work after an accident is not only ergonomically beneficial for the company but the financial and mental health of the employee. (See Appendix Q for our complete return to work program).

## **F. Hazardous Communication Control Program**

Many materials used during construction may become hazardous under certain conditions. It therefore becomes imperative that accident prevention be designed to control identification, storage, handling and use of hazardous material, to protect the user and the environment.

The Spieker Company first and foremost believes hazardous materials must be replaced by less or non-hazardous materials whenever possible. When this is not possible, The Spieker Company Hazardous Communication program is to be used. This program includes but is not limited to the follow: **(The Complete Hazard Communication Program is available from job site superintendent, and The Spieker Company Safety Director.) (Appendix F, F1, F2, F3, F4 and F5)**

- Identification and classification of hazardous materials
- Safety and Health precautions
- Training in safe storage, handling and use
- Labeling containers
- The maintenance and availability of Safety Data Sheets

**All subcontractors, prior to the commencement of the project** are to submit copies of all Safety Data Sheets for all hazardous chemicals brought to a Spieker Company controlled job site. It is the responsibility of each individual subcontractor to provide the proper protection for their employees in areas where these hazards are present. All work being



performed in areas where hazards may be present needs to be pre-authorized. Copies of any subsequent safety data sheets amendments, additions or corrections shall also be promptly submitted.

## **G. Personal Protective Equipment**

To avoid the harmful effects substances may have on the human body it is necessary to use protective clothing. The physical, chemical, or toxic property of the material dictates the type and degree of protection required. The work function and the probability of exposure must also be considered when selecting protective equipment and clothing.

All Spieker Company subcontractors and employees shall use the protective equipment mandated by local, State, and Federal rules and regulations. Any employee or subcontractor who willfully refuses to use prescribed protective equipment may be subject to disciplinary action. Superintendents are responsible for ensuring that all persons are in compliance with the following:

1. Hard Hats: All employees, subcontractors and visitors must wear hard hats at all times when in the perimeters of any Spieker Company job site. Hard hats must meet ANSI Z89.7-1969 specification for protection.
2. Eye Protection: All employees, subcontractors and visitors must wear eye protection at all times in the perimeters of any Spieker Company job site. Minimum eye protection includes approved safety glasses in accordance to ANSI Standard Z87.1 and OSHA 1910.133.
  - A. Contact lenses shall not be considered as eye protection.
  - B. An employee/subcontractor who needs corrective lenses in spectacles shall be protected by one of the following:
    - Prescription spectacles that meet or exceed the ANSI standard. Side shields are always required.
    - Goggles that can be worn over the corrective lenses without disturbing the adjustment of the spectacles.

(The Spieker Company participates in a lower cost prescription safety glass program. Please see Babette Burnett, CHST COSS COSM for details.)

- C. Full face shields shall be worn by employees/subcontractors when engaged in the following:

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- Welding
  - Cutting with torches
  - Burning
  - Chipping concrete or other stone material
  - Grinding
  - Waterproofing
  - Working around flying objects or particles
  - When cutting metal
  - Exposures such as glare
  - When working with a Metabo
  - Working near any of the above operations
- D. All concrete finishers and labors supporting the concrete crews must wear safety glasses that contain a foam gasket to help prevent the splashing of concrete under the safety glasses.
- E. All employees/Subcontractors performing overhead demolition must wear goggles/foam gasket eyewear to prevent partials from entering the eye.
- F. Subcontractors are required to comply with Spieker Company policies regarding eye protection. 100 percent eye protection is required on all Spieker Company jobsite. Each contractor is expected to comply with all OSHA regulations for their trade if at any time the regulation a more stringent than the Spieker Company policy.
- G. The Spieker Company will provide, at no cost to the employee safety glasses, goggles, and face protection that is required by OSHA standards. Subcontractors are to furnish its employees with face protection specific to their trade.
3. Hearing protection is required in some situations as dictated by the job being performed. Hearing protection must be worn by employees/subcontractors in accordance to OSHA Hearing Conservation (1910.95). Please see (Appendix O) for complete hearing conservation program.
4. Respiratory Protection may be required according to what work is being performed. Approved respirators will be used when excessive dusts, mists, gases, or other atmospheric impurities are determined to be harmful to health. The Spieker Company will provide respirators at no charge to their employees. In most cases, this will consist of an air-purifying (cartridge type) respirator with vapor cartridges. (P100)



filters may also be necessary. All Spieker Company employees and subcontractors who wear respiratory protection shall be:

- Trained in the use and maintenance of the respirator equipment.
- Medically approved to wear a respirator.
- Fit tested for the respiratory equipment to be worn.
- Clean-shaven in all areas of contact between the respirator sealing surface and facial skin.

(See Appendix A for full Respiratory Program.)

Subcontractors are responsible for providing their own respirators and must provide copy of their respirator program to the Spieker company upon request. At no time will The Spieker Company or its employees provide respirators to other company's employees in the field.

5. High vision clothing is required for all Spieker Company employees/subcontractors. High vision clothing must be displayed on the outer most layer of clothing and be visible at all times. Active roadway work requires the following:
  - A. Class 2 – all work performed with active roadway with posted speeds of under 35 miles per hour.
  - B. Class 3 – all work performed with active roadway with posted speeds of over 35 miles per hour.
6. Suitable gloves shall be worn when handling debris, old lumber, metal studs or sharp material. Gloves shall also be worn as determined by the job being performed. Including but not limited to the following:
  - A. Welding
  - B. Handling of any chemical
  - C. Cleaning of Bloodborne Pathogens
  - D. Handling steel studs (cut resistance 4 or higher must be worn)

Please consult the safety data sheet of the chemical you are using for hand protection requirements.

Specific protective equipment requirements for special projects or activities will vary based on the chemical involved and the task being performed. Check with your supervisor for site-specific PPE requirements. All Spieker Company employees are responsible for the care and maintenance on all Spieker Company issued Personal Protective Equipment.

Although The Spieker Company does not have a 100% glove policy at this time, any employee/subcontractor not wearing gloves when task requires protective hand covering, is subject to discipline.

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## **H. Wearing Apparel/Personal Hygiene Policy**

Individual responsibility that each person be dressed and prepared for each day's work. Superintendents/subcontractors are responsible for ensuring that all persons are in compliance with the following:

1. Outer Garments – suitable outerwear is defined as clothing designed to protect from expected hazards. Outer garments should be well fitting, and must be made from high visibility material. A class 2/Class 3 vest must be worn for all active roadway work and will be determined by many factors of the project. For complete (Cold and Heat Stress policy please see Appendix M)
  - A. Short sleeve garments may be worn where no hazards to exposure exist. All short sleeve garments must have a minimum of a 4" sleeve. At no time will cut off sleeves or tank tops be acceptable.
  - B. Proper foot protection will always be worn . Although steel toed boots are not mandatory, it is recommended. All footwear must be ankle high. ANSI Z41-1991, "American National Standard for Personal Protection -- Protective Footwear,"
  - C. Trousers must touch the top of protective footwear. At no time will shorts, skirts, dresses or Capri pants be acceptable.
  - E. All long hair must be pulled back and securely fastened, so that it cannot get caught in machinery and tools.
  - E. No jewelry of any kind is allowed to be worn, including wedding rings by any shop or field employee of The Spieker Company.
2. Personal Hygiene – Employees/subcontractors are responsible for maintaining high levels of personal hygiene.
  - A. Consistent bathing and oral hygiene is required.
  - B. No heavy scented colognes or perfumes.
  - C. Clean and well-groomed hair including beards, goatees, mustaches and sideburns.
  - D. Clothing must be clean and free of odors.

## **I. Housekeeping/Life Safety**

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Proper housekeeping is the foundation for a safe work environment. It helps prevent accidents and fires, as well as creating a professional appearance on the work site.

- All floors are to be swept frequently. At no time is dry sweeping allowed when debris contains silica. Sweeping compound must be used.
- Combustible packaging materials are to be removed immediately.
- Ensure that all exits are clear. This includes areas directly affected as well as all other exits.
- Be sure that all fire lanes are free from vehicles and materials.
- Disabling of the fire protection system is not allowed. If necessary, to do so a proper JSA must be presented to The Spieker Company superintendent.
- Whenever safety of adjacent areas of an occupied building is compromised because of construction, staff must be informed.
- Trash containers are never to be located in the immediate proximity of flammable materials.
- Oily rags are not to be placed in regular trash containers.
- Electrical panels and switches will not be blocked.
- Hoses and electrical cords are not to cross aisles or lie in work area
- Creating tripping hazards. They should be coiled or strung overhead.
- Stored materials shall be neatly stacked.
- Tools shall be cleaned and stored when not in use.
- The construction site must be restricted from all but authorized staff. Adequate signage shall be provided.
- Construction workers must be made aware of egress routes.
- Exit routes must be inspected daily to ensure no obstacles.

**Please see Appendix D for The Spieker Company Fire Protection Program**

## **J. Company Vehicles & Driving Safety**

**The following policy has been established to encourage safe operation of vehicles, and clarify insurance issues relating to drivers and The Spieker Company:**

- All drivers must have a valid driver's license.
- Employees and passengers must wear safety belts while the vehicle is in motion.
- The vehicle must be maintained in accord with Spieker maintenance requirements. Employees must report all mechanical problems to their superior immediately.

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- Before operating the vehicle, do a visual inspection.
- Employees are responsible for all traffic and parking violations they receive when using company vehicles.
- Motor Vehicle Records will be checked periodically. Driving privileges may be suspended or terminated if your record indicates an unacceptable number of accidents or violations. Should your record fall into our insurance carrier's guidelines of an "unacceptable driver", your employment may be terminated.
- Your supervisor must be notified of any change in your license status or driving record. A copy of your driver's license may be requested periodically for insurance and record keeping purposes.
- No unauthorized use of company vehicles shall be permitted.
- All company vehicles over 10,000 pounds are not to be driven over state lines into Michigan, by anyone holding a Michigan driver's license unless they possess a Michigan Chauffeur's License. (Please note, proof is required).
- All employees driving a company vehicle over 10,000 pounds is required to have a yearly or bi-yearly physical, depending on their current health standing.
- Texting is strictly prohibited while driving company vehicles or on company business. Violations subject to reprimand, including possible termination.
- Mobile phone use in both private and company vehicles must comply with the following DOT regulations:
  - **Compliance**
    - Make sure the mobile telephone is in within close enough proximity that it is operable while the driver is restrained by properly installed and adjusted seat belts.
    - Use an earpiece or the speaker phone function.
    - Use voice-activated dialing.  
Use the hands-free feature. To comply, a driver must have his or her mobile telephone located where he or she is able to initiate, answer, or terminate a call by touching a single button. The driver must be in the seated driving position and properly restrained by a seat belt. Drivers are not in compliance if they unsafely reach for a mobile phone, even if they intend to use the hands-free function. (Appendix P Complete Program with required signature line)

### **When operating your own vehicle for Spieker business:**

- Your personal auto liability insurance is the primary payer. Spieker insurance is in excess of your coverage.
- It is recommended you carry at least \$100,000 per occurrence liability coverage. Evidence of insurance coverage shall be  
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provided to Spieker each year, if requested, by either a copy of your policy's Declaration page or a Certificate of Insurance.

- Spieker is not responsible for the physical damage to your vehicle. You must carry your own collision and comprehensive coverage.
- Report millage for expense reimbursement.

**If in an accident:**

- Take necessary steps to protect the lives of yourself and others.
- Comply with police instructions.
- Do not assume or admit fault. Others will determine liability and negligence after thorough investigation.
- Report the accident to The Spieker Company's Health and Safety Director as soon as possible.

**K. Drug Free Work Place**

With the exception of over the counter drugs, such as aspirin, or drugs prescribed by a physician, there shall be no drugs or alcohol at any Spieker Company job site. Any employee that is taking a prescription or over the counter drug that they feel may impair their ability to do their job safety can report it and be given a non-safety sensitive task. **Please see The Spieker Company Drug Free Workplace Policy for complete guidelines. (Appendix U)**

**All subcontractors are to produce a negative drug for each employee on site, upon request. All subcontractors performing work on a state funded project must be current on the BWC drug free contractor list.**

**L. Smoking**

There shall be no smoking except in designated smoking areas. Under no circumstances, will there be any smoking during refueling or within 50 feet of a flammable material. There shall be no smoking around welding operations, compressed gas storage, or flammable and combustible materials or liquids.

**M. Cell phones & Electronic Devices**

Cell phones and other electronic devices can be useful for jobsite communications. However, the use of electronic devices can be a distraction and create safety hazards for workers and those around them.



- Cell phones and other electronic devices may only be used in a designated safe spot. These areas will be pointed out by the superintendent prior to the commencement of work on each project. If a phone call is received outside the safe zone area the worker will disregard the call. If it is an emergency worker must stop work, answer the phone, and go to the nearest designated area before conversation can begin.
- Superintendents may use cell phones or electronic devices throughout the jobsite if they are stationary, and not working.
- Employees engaged in a task requiring their full attention, such as a fire watch may not use their cell phone until they are relieved from their duty.
- Cell phones or electronic devices may not be used when operating any company vehicle Please see (Appendix P ) or construction equipment unless two-way communication is required. (example between a crane operator and an out of site signal person).
- If at any point work being required calls for an exception to this policy a JSA covering said work is mandatory.

## **N. Assured Grounding Conductor Program**

The AGCP covers all extension cords, receptacles which are not part of the permanent wiring of the building or structure, and equipment connected by cord that is available for employee use.

- All vendors and subcontractors are required to comply with the National Fire Protection Association (NFPA) Standard #70-1975 “National Electrical Code” when installing and maintaining electrical systems. Electrical wiring, apparatus and equipment shall be manufactured to the specifications stated in the National Electric Code.
- All temporary wiring will be effectively grounded in accordance with NFPA #70-1975 Articles 305 and 310.
  
- Only authorized and qualified electrical technicians will perform work on or repair electrical circuits/equipment.
- Personnel will wear no jewelry or other metal items before performing work on or within four feet of electrical circuits/equipment.
- Work will not be performed on electrical circuits/equipment with wet hands, while wearing wet clothing, or while standing in water.
- ANSI approved PPE for the task at hand must be worn.



- Personnel that may come into contact with live wires, conductors or current-carrying parts of equipment in the course of their work will wear approved rubber gloves.
- All 120-volt, single-phase 15- and 20-ampere receptacle outlets on a Spieker Company job site, which are not a part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground-fault circuit interrupters for personal protection. If no GFCI protection is provided at the temporary service drop, employees are to assure portable GFCI are used.
- Live electrical parts shall be guarded against accidental contact by cabinet enclosure, location or guarding.
- Working space around electric equipment and distribution boxes will be kept clear and assessable.
- Circuit breakers, switch boxes, etc. will be legibly marked to indicate their purpose.
- Employees will not work in such close (able to contact) proximity to any part of an electric power circuit unless the circuit is de-energized, grounded or guarded by insulation.
- Equipment or circuits that are de-energized will be locked out and tagged out. The tags will plainly identify the equipment or circuits being worked on.
- All extension cords will be three-wire (grounded) type and be designed for hard or extra hard usage.
- All extension cords must be inspected before each use. No frayed, cracked or cut extension cords may be used. All damaged extension cords are to be marked and returned to the shop for disposal.
- All lamps for general illumination will have the bulbs protected against breakage. Temporary lights will not be suspended by their electrical cords unless designed for such suspension.
- Extension cords may not lay in water.
- Extension cords must be secured and out of the traffic flow to prevent tripping.
- Equipment that dose not meet the requirements shall not be used.

## **O. Compressed Cylinders**

- All gas cylinders will have their contents clearly marked on the outside of each cylinder.
- Cylinders must be transported, stored, and secured in an upright position.

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- Cylinder valves must be protected with caps and closed when not in use.
- All leaking or defective cylinders must be removed from service promptly, tagged as inoperable and placed in an open space removed from the work area.
- Cylinders are to be used only for the purpose for which they are designed.
- All cylinders will be tagged as “Empty” when appropriate.

## **P. Fire Extinguishers**

- Access to all firefighting equipment shall be maintained at all times.
- Fire Extinguishers no less than 2A shall be placed every 100 feet of direct travel on all Spieker Company controlled job sites.
- One fire extinguisher no less than 2A shall be available for each 3,000sf of working space.
- Where jobsites are more than one story in height a fire extinguisher is to be kept adjacent to each stairwell.
- Subcontractors must furnish their own fire extinguishers and trained fire watch personnel when performing hot work (welding, cutting, grinding, ect.). Fire extinguishers must also be provided inside all contractors’ trailers, temporary enclosures and large equipment.
- Fire Extinguishers shall be inspected monthly and have an inspection card. Inspections shall be in accordance with NFPA 10 standard for portable fire extinguishers.
- Fire extinguishers must be labeled with the owner’s identification.
- Fire extinguishers must be properly rated for the hazard.

## **Q. Ladders**

Ladder safety is of the utmost importance. **Please see The Spieker Company Portable Ladder program for complete safety guidelines. (Appendix E)**  
**All subcontractors are required to train their employees on the proper use of ladders.**

## **R. Powered Industrial Trucks/Elevated Work Platforms/Cranes**

Powered industrial trucks including but not limited to: Forklifts, bobcats, and rough terrain forklifts can be dangerous. The Spieker Company requires the following safety procedures.

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- All operators must be properly trained.
- A recertification is required every 3 years for Lulls.
- All operators must inspect the piece of equipment before each use. Equipment not working properly or deemed unsafe shall not be used, tagged and removed from service.
- All manuals must be located on the piece of equipment.
- Ensure the piece of equipment has all safety equipment such as a fire extinguisher, horn, adequate lighting, rollover cage, backup alarm, mirrors and flashing light.
- No person shall be allowed to ride on any powered industrial truck.
- No person shall be allowed to stand or pass under the elevated portion of any truck or elevated work platforms, whether loaded or empty.
- Know the recommended load limit of the truck and never exceed it.
- When a powered industrial truck is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, and power shall be shut off, and brakes set. Wheels shall be blocked if the truck is parked on an incline.
- The engine must be off on all power industrial trucks when refueling.
- Ensure that the surface on which you are traveling is steady and can safely carry the weight of the vehicle, operator and load.
- Travel with the load in a low position and always look in the direction of travel.
- Never operate any power industrial vehicle or elevated work platform within 10 feet of a power line or other source of electricity.
- A safe distance shall be maintained from the edge of ramps, platforms, and excavations.
- Personnel shall not sit or climb on the handrails of an elevated platform. Wood planking, ladders or other objects to improve personnel access shall not be used in elevated work platforms.
- Personal fall protection must be worn and properly attached in all work platforms.
- Subcontractors are required to have 100 percent fall protection when performing task while in a scissor lift. Proper equipment must be used to comply with manufacturer's anchor point restrictions.

Please see (Appendix N) for complete Aerial/Scissor Lift Program

## **S. Cranes/Rigging/Hoisting Operations**

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**It is The Spieker Company's Policy that all operations using a crane must be reported to the Safety Director, Babette Burnett, CHST COSS COSM.**

A job specific crane lift plan must be in place prior to the commencement of work. This includes but not limited to the following:

- Crane inspections.
- Verification of training.
- Safety Plan/Fall Protection
- Copy of the operator's credentials.
- A crane lift procedure including a JSA, and pre lift meeting shall be required for all critical lifts above 75% of crane capacity, multi-crane lifts and lift of 100 tones or greater.
- All rigging must be done by a trained rigger/signaler.
- Training Certification must be on site at the time of lift.
- A competent person must inspect all rigging components prior to each use.
- Ensuring that proper rigging is being used for capacity. Do not use rigging beyond its recommended load capacity.
- Ensure that rigging when not in use is stored in an area that the rigging is protected from the weather and incidental damage.
- All rigging equipment found to be damaged or defective must be removed or destroyed immediately.
- Tag lines shall always be used.
- All hooks used for overhead lifting shall be equipped with safety latches.
- Shake out hooks may only be used for unloading materials from trucks. And will not be used for overhead lifting.
- Ensuring that all load lines are being configured to be as vertical as possible.

(See Appendix S4, Lift plan form)

Subcontractors are to schedule lifts with the on-site superintendent and to follow all required procedures.

## **2) Hoists and Slings**

It is The Spieker Company policy that only authorized, and fully trained personnel are permitted to operate hoist. The following also applies to all hoisting operations:

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- Visual inspections of hoisting equipment will be made prior to use.
- All hoists are to be inspected and load tested annually.
- All slings are to be inspected and load tested semi-annually. Metal tags will be affixed to the sling showing the date tested, load capacity, and expiration date of the test.
- Posted load limits are never to be exceeded under any circumstances.
- All hooks are to have an operating safety latch.
- Hoists are not to be operated over personnel.
- Hoist operators are never to leave the area with a suspended load.
- Any equipment malfunction must be reported to the Safety Director and taken immediately out of service.

## **T. Fall Protection / Self propelled booms and scissor lifts**

The Spieker Company requires all employees and subcontractors to comply with OSHA 1926 Subpart M fall protection regulations. Personal fall arrest systems must be worn at heights over 6 feet. There will be **no exceptions** to this policy without prior approval. The following is not allowed on any Spieker Company job site:

Safety Monitors- All roofing operations outside a 6-foot wringing line requires 100% tie off.

Controlled Decking Zones – Are not allowed as a primary means of fall protection.

Where a Personal Fall Arrest System is required, 100 percent anchorage (tie-off) is always required. This means twin lanyards must be used where necessary to disconnect.

A Personal Fall Arrest System is required when moving or working in elevated work platforms, this is to include scissor lifts, self-propelled booms and crane supported “man basket”.

All personnel/subcontractors are required to wear fall protection when working in a scissor lift. Proper fall protection must be used to adhere to the anchor point limitations.

Fall Protection equipment shall be in proper working condition and must be routinely inspected, including before each use. All fall protection equipment



found in questionable or poor condition will be removed from service without notice.

Please see (Appendix J for full Fall Protection Program.)

## **U. Visiting Policy**

All visitors must report to The Spieker Company construction job office. Visitors will be required to comply with the safety policy programs and procedures while on site. Visitors not sufficiently familiar with the job site rules and regulations must always be accompanied by employees familiar with the project.

Visitors must wear a hard hat, safety glasses and high visibility vest at all times while within the boundaries of a Spieker Company controlled project.

## **V. Confined Space Entry**

The Spieker Company requires all employees and subcontractors to follow 29 CFR 1926 Subpart AA. This includes but is not limited to the sharing of information. Please see (Appendix H) for The Spieker Company complete confined space program.

It is imperative that safety measures are taken and that risks are eliminated before work commences in a confined space.

The Spieker Company current confined space entry policy is **“DO NOT ENTER”**

Contact your superintendent or Babette Burnett CHST COSS COSM, Safety Director immediately if there is any confined space within the perimeter of your scope of work.

- Subcontractors are to supply The Spieker Company Safety Director a full
- Copy of their Confined Space program.
- Permits are required to enter any permit required confined space.
- At no time are Conex boxes to be used as office space.

## **W. Storage**

1. Temporary Buildings/Trailers





- No temporary buildings are to be placed where they could prevent entry or exit from a structure. Temporary buildings must be of non- combustible construction.
- Precautions should be taken to prevent storage of flammable or combustible materials between buildings/Trailers.
- Indoor Storage
- Materials in storage are not to prevent exit.
- No more than 5 gallons of class IA or IB may be stored inside and must be in approved safety containers or DOT approved containers or 25 gallons in an approved cabinet.
- Stored materials are to be in secure piles and located to minimize the spread of fire
- The following clearances must be maintained at all times:
  - A. 36 inches between the top of stored material and a sprinkler defector.
  - B. Sufficient space around lights and heating units to prevent ignition of combustible materials.
  - C. 24 inches around the path of travel near fire doors.
  - D. Materials will not be stored within 36 inches (3 Foot) of a fire door opening.

## 2. Outdoor Storage

- No gasoline or diesel cans (25 gallons or less) are to be stored within 10 feet of any building.
- Outdoor storage of flammable liquids in larger quantities must reported to the safety director and further action must be taken.
- Only approved containers will be used for storage and handling of flammable and combustible liquids.
- Approved safety cans will be used for handling and use of flammable liquids. Flammable liquid material may be used and handled in original shipping containers.
- Combustible liquids may be stored no closer than 20 foot from any structure.
- A fire extinguisher must be kept within 30 foot of any flammable liquid of storage of 25 gallons or more.

## **X. Excavations/Trenching**

Excavations and trenching are among the most hazardous construction operations. The Spieker Company requires that all employees and subcontractors follow all regulations in OSHA **1926 Subpart P**.



- A competent person must be on site during all trenching and excavation and trenching work.
- All excavations over 5 feet in depth must be protected.
- All excavations over 4 feet must have a means of safe access and egress.
- All means of access and egress must be located within 25 feet of all workers. This can be ladders, steps, or ramps.
- A competent person must inspect all excavations and trenches before each shift.
- All excavations and trenches must be inspected after a rainstorm by a competent person
- Heavy equipment must be kept away from trench edges.
- Keep surcharge loads at least 2 feet from trench edges.
- All excavations 20 feet or greater in depth requires that the protective system is designed by a registered professional engineer.
- Always be aware of the atmosphere in the excavation. Test for low oxygen, hazardous fumes and toxic gas when necessary.
- All excavations and trenches of 6 foot in depth must be protected by a hard-barricading system.
- Prior to opening any excavation, trench or ground disturbance, a JSA must be completed and approved by The Spieker Company superintendent. It must contain an OUPS ticket number to verify all underground utilities have been marked.

## **Y. Steel Erection**

All applicable Spieker Company safety standards and **OSHA 1926 Subpart R regulations** shall be followed for steel erection.

- An erection plan will be prepared by the steel erectors competent person.
- A tag line will be used to control all loads
- To access upper levels, elevated lift platforms, ladder, scaffolds, and personnel baskets may be used. (Use of crane supported man baskets require a critical lift plan and training.)
- Double lanyards must be used when transferring to an upper level from a self-propelled boom or scissor lift.
- Personnel must use approved fall protection at all times, for their trade.
- Sliding down steel is not permitted.
- All workers must wear 100% fall protection equipment during connecting procedures above 6ft.



## Z. Scaffolds

Erection:

Scaffolds shall be erected, modified, and dismantled under the supervision of a competent person as defined by OSHA. All **OSHA 1926 Subpart L** regulations must be followed. Including but not limited to the following:

- All wood planking shall be Scaffold Grade. Nominal grade lumber is never allowed.
- All Scaffold planking must overlap 6” at both ends.
- Concrete blocks, bricks, crates or similar will not be used as support. All non-mobile scaffolds shall have base plates.
- Mud sills must be adequate for the type of soil scaffolding with be erected upon.
- All horizontal and vertical section, cross-braces, handrails, planking and other components shall be tightly secured and inspected prior to use.
- Scaffolds shall be tied to and securely braced against a structure, at a 4:1 height ratio, and continuing every 20 foot thereafter.
- Guardrails, mid-rails, and toe boards shall be installed on all scaffolding over 6 feet.
- Where handrails are not practical, a full-body harness with lanyard shall be worn.
- Where toe boards are not practical, the area beneath and surrounding the platform shall be barricaded.
- Employees erecting scaffolds must wear a securely anchored and wear a personal fall arrest system unless it can be proven that it is not feasible or if doing so will create an additional hazard.
- Anchoring to scaffolding is never permitted.
- All rolling scaffolds shall have their wheels locked or chocked, with diagonal bracing installed.
- No rolling scaffolds shall be moved while occupied and until all equipment and tools have been removed.

Scaffolding Inspections:

Scaffolding shall be inspected by a competent person prior to initial use and tagged with a “Ready for Use” tag if deemed safe. A competent person shall inspect scaffolding each shift and log each inspection on the “Scaffolding Inspection Checklist” (Appendix R1)



If for any reason scaffolding becomes unsafe, is being modified or is involved in an accident a red “Danger – Keep Off” tag shall be affixed to the scaffolding and may not be used until it is repaired and re inspected.

All Subcontractors are to follow OSHA regulations for their trade. It is the responsibility of all subcontractors to provide their own competent individuals to perform initial and routine inspections.

## AA. Power Operated Tools and Equipment Guarding

### Fuel Powered Tools

- All fuel powered tools and equipment must be stopped while being refueled, serviced or maintained.
- Fuel must be transported, handled and stored in accordance with the requirements for storage and handling of flammable and combustible liquids.

### Hydraulic Power Tools and Equipment

- Keep all tools in good condition and regular maintenance.
- The fluid used in hydraulic tools and equipment must be fire-resistant.
- Precautions should be taken to ensure that hydraulic fluid will retain its operating characteristics at those temperatures to which it will be exposed.
- Power operated tools or equipment will not be used in explosive or flammable atmospheres.
- All subcontractors are required to have and maintain a spill kit on every Spieker Company project.

### Electric Power Tools

- Keep all tools in good condition and regular maintenance.
- Use GFCI if plugging into an extension cord or an outlet if you are not sure it a circuit interrupter protects it.

All power operated tools and equipment must be locked out/tagged out for maintenance. No equipment or power tools are to be repaired on a job site or in the shop. **All repairs and service must be coordinated through Matt Easterwood.**

All employees and subcontractors must be trained and qualified to run any power tool or piece of equipment.



### Machine Guards

- All guards on saws, drill presses, and machines are to be properly adjusted and in working order before using the machine.
- All gear and belt guards must be in place before operations.
- Machine guards must be kept in position at all times unless removal is authorized for cleaning.

### **BB. Welding, Burning, and Cutting**

Only authorized and trained personnel are permitted to use welding, cutting and or brazing equipment. A permit is required on all Spieker Company controlled job sites. All employees and subcontractors will be required to follow **OSHA Regulation 1926 Subpart J.** including but not limited to the follow:

- An approved fire extinguisher shall be ready for instant use in all locations where welding/hot work is being performed.
- Oxygen and fuel gas cylinders properly secured in the cart or cylinder rack.
- Surrounding area must be clear of all combustibles, including below.
- Work must be a minimum of 50 feet from all fuel, gas cylinders, and explosive storage locations.
- Exhaust ventilation systems within 35 feet must be shut down or protected.
- A fire watch must be assigned when there is a potential for a fire. Fire watch is to remain for 1 hour after hot work has been completed.
- All cylinders must be marked, including when empty.
- All valves must be closed before cylinder is moved.
- At the end of each work day, the gas cylinder valves must be closed, regulators removed and properly stored.
- Cylinders containing oxygen, acetylene or other fuel gas cannot be taken into confined space.

### **CC. Lockout/Tagout**

When any employee or subcontractor works on a piece of powered machinery or equipment, either mechanical or electrical a lockout/Tagout procedure must be in place. **A copy of The Spieker Company Lockout/Tagout Program is**

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available from all job site superintendents and Babette Burnett, CHST  
COSS COSM Safety Director.  
(Appendix G)

All subcontractor Lockout/Tagout Procedures must comply with the following OSHA standards.

- Control of Hazardous Energy (Mechanical lockout/tagout) 29 CFR 1910.147
- Electrical Safe Work Practice Standard 29 CFR 1910.333
- Lockout and Tagout of Circuits 29 CFR 1926.417
- Accident Prevention Tags 29 CFR 1926.200 (h)

## **DD. Masonry**

In addition to the requirements contained in OSHA 29 CFR 1926.706 the following is required:

- A qualified person shall be on site during all construction of masonry walls.
- No personal beyond masons performing essential work are allowed in the controlled access zone.
- No one shall be permitted within the controlled access zone of an unbraced wall if winds speed of more than 20 miles per hour.
- A danger sign must be posted on every unsupported masonry wall over 6ft.
- No one shall be permitted under loads being hoisted to another level.
- Danger tape must be placed around scaffolding to prevent others from walking beneath work being performed.

## **EE. Demolition**

### Structural/Non-Structural Demolition

Prior to all structural demolition a survey by a competent person to determine the condition of framing, floors and walls must be performed to eliminate the possibility of collapse. A complete demolition plan must be prepared by a competent person prior to the commencement of work on

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and structural demolition.

- Areas being demolished must be secured by means of barricade to prevent unauthorized personnel and the general public from entering the area
- Proper construction warning signs shall be posted.
- Subcontractors/superintendents must do a JSA prior to the removal of any structural demolition.
- Unstable structures shall be shored or braced prior to any work being performed.
- Utility companies must be contacted in advance of demolition procedures starting. All utilities are to be shut off or relocated if needed during the demolition process.
- Always start at top and work down whenever possible.
- If employee entrance could be communized with falling debris, a shed or canopy must protect the entrance.
- Employee Entrance
  - 8 feet from the building
  - 2 feet wider than the entrance
  - Must sustain a load of 150 lbs. per square foot
- Protect wall openings to 42 inches.
- Holes 2x2 or larger must be covered before and during the demolition process. Each must hole must:
  - Be marked "Hole"
  - With stand 2x the intendent load
  - Be secured
- Debris chutes are required when disposing of materials over 20 feet.
- Chutes must be enclosed when steeper than 45 degrees
- When debris chutes or are not being used or debris is being disposed through floor holes, protect debris dumping area with the following:
  - A coral or barricade system 42" high.
  - 6" out from all sides.
  - Warning signs.
  - No spaces between opening and edge of chute.
  - Mechanical equipment or wheelbarrows require a toe board if being directly dumped into chute.
  - Cease above operations before removing above. A spotter must be in place on upper level.
  - Walls and floors used to retain piled debris must safety support the load.
  - Use only designated stairways. All stairways must have the following:
    - Proper illumination.
    - Be inspected periodically.

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- Kept in clean and safe condition
- Stairs without pans filled are not to be used.

At no time will The Spieker Company use explosive charges or mechanical wrecking balls in any demolition project.

#### Hospital Renovation

- All debris containers must be covered before being removed from construction area.
- Construction areas must maintain negative air pressure. All subcontractors are to immediately report any problems with ICRA containment to The Spieker Company Superintendent.
- Routes shall be established for the removal of debris and movement of materials through occupied areas of hospital.
- Walk-off mats shall be used at construction entrances to prevent dust from being tracked through the hospital. It is not only Spieker Company's responsibility to maintain the freshness of the mats but also each individual subcontractor.

## **FF. Stretch and Flex Program**

As part of our commitment to safety, the Stretch & Flex program is performed daily at all Spieker Company job sites. The program is designed to prepare the body for active movement, increasing blood supply and oxygen to the working muscles, while also increasing range of motion and decreasing the risk of soft tissue injury. (See Appendix I for complete program)

**The Spieker Companies top priority is the safety of its employees. When in doubt always err on the side of caution. Not only for your safety, but also those around you.**

**Any questions regarding these policies and procedures please contact Babette Burnett, CHST COSS COSM at 419-392-6123.**

**Babette Burnett, CHST COSS COSM  
Director of Health and Safety**

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GENERAL CONTRACTORS

## The Spieker Company

Revision Number	Date	Safety Director
1	01/23/2014	Babette Burnett, COSS
2	01/23/2015	Babette Burnett, COSS
3	01/11/2016	Babette Burnett, COSS COSM
4 Plan revised	02/04/2016	Babette Burnett, COSS COSM
5 Plan revised	01/09/2017	Babette Burnett, COSS COSM
6 Plan revised	01/19/2018	Babette Burnett, CHST COSS COSM
7 Plan revised	01/14/2019	Babette Burnett, CHST COSS COSM
8 Plan revised	01/20/2020	Babette Burnett, CHST COSS COSM
9 Plan revised	01/02/2021	Babette Burnett, CHST COSS COSM