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MANAGEMENT POLICY STATEMENT

The Steel Safety Association of Colorado (SESAC) Erectors recognizes that our employees are the most important asset of this company. With that concept in mind, we pledge to provide the safest and most practical working conditions possible for the employees of SESAC by means of a joint management/employee effort.


Management personnel will be responsible and accountable for maintaining safe working conditions on the job. The Owners and top management personnel of this Company will provide for training on a regular basis to ensure that all employees possess the knowledge and skill required to perform their work in a safe and efficient manner. Management personnel will be accountable for maintaining consistent enforcement of this policy as representatives of this Company.

Likewise, employees will be responsible and accountable for following the guidelines outlined in this safety policy. Teamwork is not optional at SESAC. Every employee, management, and field personnel alike, will be required to deliver 100% effort each day toward the common goal of maintaining a safe and positive work environment.

As a pro-active, progressive employer, this Company is dedicated to the development of 100% fall protection as part of our overall commitment to provide maximum safety during steel erection.

The safety of our employees is considered to be the highest priority of Company business. We hope you feel the same way.

Eric Pelletier
President

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CONTINUITY OF POLICIES - Right to Change or Discontinue

The policies and procedures in this manual are not intended to be contractual commitments by SESAC and shall not be construed as such. They are intended to be guides to management and merely descriptive of suggested procedures to be followed.

SESAC reserves the right to revoke, change, or supplement these guidelines at any time without notice. Such changes shall be effective immediately upon approval by management unless otherwise stated.

STATEMENT OF POLICY


It is the policy and the goal of this Organization association to provide a safe and healthful place of employment for ALL ITS MEMBERS. It is the purpose of this stated policy to:

1. Abide by all federal, state and local regulations as they pertain to Construction.
2. Apply good sense and safe practices to all jobs.
3. Exercise good judgement in the application of this policy.
4. Protect the public from hazards resulting from our operations.

ASSIGNMENT OF RESPONSIBILITIES - To further our goals the following assignments of responsibility are made:

MANAGEMENT

1. Establish rules and programs designed to promote safety and make known to all members the established rules and programs.
2. Provide all supervisors with copies of appropriate rules and regulations.
3. Make available training for members to enable them to perform their tasks safely.
4. Impress upon all the responsibility and accountability of each individual to maintain a safe workplace.
6. Record violations and investigate accidents.
7. Discipline members with regard to this policy.
8. Encourage all prime contractors to work safely.
9. Appoint an association member with enforcement authority over safety matters.
10. Conduct safety inspections of the member's job sites, maintain records, and monitor the program for effectiveness.


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SUPERINTENDENTS

1. Conduct site specific safety orientation for new workers and plan production so that all work will be done in compliance with established safety regulations.
2. Conduct and document daily pre-task planning with work crews and be responsible for on-the-job safety and health and secure the correction of safety deficiencies.
3. Make sure proper safety materials and protective devices are available and used where needed and all equipment is in safe working order.
4. Instruct foremen in safety requirements.
5. Review accidents, supervise correction of unsafe practices, and file accident reports.
6. Conduct jobsite safety meetings and provide employees with proper instruction on safety requirements.
7. Notify association office of safety violations.
8. Provide for the protection of the public from steel erection operations.
9. To the extent that the work of others affects the safety of members of this association, attempt to ensure safe performance by others present on the site, including owner and architect/engineer representatives, the public, visitors, and the employees of other contractors.
10. Secure prompt medical attention for any injured employees.

JOB FOREMEN

1. Carry out safety programs at the work level and assist the superintendent in conducting daily pre-task planning sessions.
2. Be aware of safety requirements and safe working practices.
3. Plan work activities to comply with safe working practices.
4. Instruct new employees and existing employees performing new tasks on safe working practices.
5. Install and maintain devices to protect the public from association operations.
6. Make sure protective equipment is available and used where needed.
7. Make sure work is performed in a safe manner and no unsafe conditions or equipment are present.
8. Correct all hazards, including unsafe acts and conditions which are within the scope of your position.
9. Report all injuries and safety violations.


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CRANE OPERATORS

1. Be familiar with your crane load chart, including all restrictions and footnotes contained in the chart, and do not exceed rated capacity.
2. Be familiar with the Operators Manual for your crane. Maintain your crane per the maintenance and lubrication schedules found in the manual. If maintenance, lubrication, adjustments, or repairs are necessary which you cannot perform, or if you misplace your manual, you must promptly report this to your supervisor so that he can bring in a mechanic and/or replace the missing manual.
3. Perform and make a written record of your daily crane inspections. Inspect your crane at intervals required by management as follows: Frequent Inspection (daily), Periodic Inspection (quarterly), and Annual Certification (when requested by management).
4. Be sure that your crane is suitably level before hoisting loads.
5. Be familiar with the standard hand signals for controlling crane operations.
6. Do not engage in any practice which will divert your attention while you are actually engaged in operating your crane.
7. Sound your horn at the beginning of your lift to warn nearby workers, and avoid hoisting loads over people wherever possible.
8. Maintain a safe distance between your crane and electric power lines.
9. Whenever there is any doubt concerning the safety of a lift, the crane operator has the responsibility and the authority to stop and refuse to make the lift until safety has been assured.

CRAFT WORKERS

1. Work safely in such a manner as to ensure your own safety as well as that of coworkers and others.
2. Request help when unsure about how to perform any task safely.
3. Correct unsafe acts or conditions within the scope of the immediate work.
4. Report any uncorrected unsafe acts or conditions to the appropriate supervisor.
5. Report for work in good mental and physical condition to safely carry out assigned duties.
6. Familiarize yourself with the association safety program.
7. Use and maintain all safety devices provided.
8. Maintain and properly use all tools under your control.
9. Follow all safety rules.
10. Provide help to fellow employees regarding safety requirements.
11. Immediately report all injuries, however slight, to your foreman.

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ALL PERSONNEL

1. Strive to make all operations safe.
2. Maintain mental and physical health conducive to working safely.
3. Keep all work areas clean and free of debris.
4. Assess result of your actions on the entire workplace. Work shall not be performed in ways that cause hazards for others.
5. Before leaving work, replace or repair safety precaution signs removed or altered. Unsafe conditions shall not be left to imperil others.
6. Abide by the safety rules and regulations of every construction site.
7. Work in strict conformance with federal, state and local regulations.
8. Review Safety Data Sheets (SDS) prior to working with covered materials.


VISITORS

1. Abide by all safety rules.
2. Check in with the project superintendent before entering the construction area so that personal protective equipment may be provided such as hard hats, eye protection, etc.
3. Keep out of all construction areas unless authorized in advance by the project superintendent.

POSTINGS OF INFORMATION AND NOTICES

The following information and notices will either be posted or available for inspection:

- Emergency Telephone Numbers
- U.S. Department of Labor
 - Job Safety and Health Protection
 - Bureau of Labor Statistics
 - Log and Summary of Occupational Injuries and Illnesses
 - b) Annual Summary OSHA 300
 - Minimum Wage Rate Poster
 - Medical Records Access Statement
 - Equal Employment Opportunity Statements
 - State Workers' Compensation Commission
 - Workers' Health and Safety

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Hazard Communication Program

At most job sites this information will be posted in the jobsite trailer. On small projects (which do not have a jobsite trailer), the project superintendent will make available any pertinent information or notices on request. Some projects will not be able to support the posting of this information, in such a case the above noted information will be available for review at the member company's corporate office.


Shall any posted information or notices be lost or stolen, the project superintendent will obtain a duplicate for posting or member inspection upon request.

SAFETY PROBLEM SOLVING

It is the intent of SESAC to provide a safe work place for all members. Supervisory personnel have been instructed to watch for and correct all unsafe conditions immediately. However, construction sites are complex and items can be overlooked. It is important that all members be on the lookout for unsafe conditions. If you observe a condition that is unsafe, the following actions are to be taken:

1. If possible, correct the condition immediately.
2. If you are not able to take corrective action, report the condition to your immediate supervisor for correction.
3. All association members with supervisory responsibility have been instructed to take corrective action or contact someone who can when a safety concern is raised. In the event, corrective action is not begun in a reasonable length of time, the member is requested to contact the association.

We appreciate your cooperation in reporting all safety problems. If we all work together, we can all work safely.

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TRAINING

- GENERAL

The employer shall instruct each member in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

Members required handling or using poisons, caustics, and other harmful substances shall be instructed regarding the safe handling and use, and be made aware of the potential hazards, personal hygiene, and personal protective measures required.

Members that are required to handle or use flammable liquids, gases, or toxic materials shall be instructed in the safe handling and use of these materials.

All members required to enter into confined or enclosed spaces shall be instructed as to the nature of the hazards involved, the necessary precautions to be taken, and in the use of protective and emergency equipment required. The employer shall comply with any specific regulations that apply to work in dangerous or potentially dangerous areas.

Training must be given to all members to ensure the proper operation of tools, equipment, and most job tasks.


All safety training must be documented.

- NEW HIRE ORIENTATION

Member companies will train new hires on health and safety in the workplace. Immediately after each new employee is hired or given a new project assignment, his/her supervisor will go through the necessary safety requirements with him/her. The employee will be encouraged to ask questions about any part of the project's safety program he/she may not understand. Items to be covered in this session will include a brief overall review of safety rules pertaining to the new member's duties, enforcement policies, and accident reporting. See Section 3: New Hire Orientation.

The new hire orientation shall include, but not be limited to, the following subjects (if applicable):

- Employer/employee responsibilities
- Required attendance and participation at regular safety meetings and other training


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- Disciplinary action for non-compliance with safety policy
- Accident reporting - Report immediately to supervisors and in writing, to the employer within 4 days.
- The location of First Aid facilities, telephones, as well as emergency phone numbers
- PPE including eye, head, hearing, foot, respiratory, and fall protection equipment
- Fall protection including scaffold/ladders
- Housekeeping, warning signs, barricades
- Fire prevention and protection
- Material handling, storage, rigging and crane safety
- Electrical safety including Lockout/Tagout procedures
- Special project requirements or procedures (Welding Certification, Hot work, etc.).
- Emergency Evacuation Procedures Member safety responsibilities
- **SPECIFIC TRAINING**

Specific training will be conducted whenever the need for such training is identified by supervisors, and whenever requested by members. The need for training will become evident through supervision of employees work practices, inspections of the workplace, and review of accident and near-miss investigations.

All training must be documented.

OSHA 1926.21(b)(2) states that "The employer shall instruct each member in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury". Training will be provided to all members which meets or exceeds this requirement of the OSHA standards.

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Employees will be trained on the proper use and maintenance of tools and equipment used for access to work areas. These items include ladders, scaffolds, and powered work platforms such as JLG lifts, and scissor lifts.

OSHA requires all forklift operators to be trained, evaluated and certified before ever operating the forklift in the field (except for training purposes). All of the OSHA requirements must be met before anyone is allowed to use a forklift on any jobsite.

Employees will be trained on the proper use and storage of flammable liquids in the workplace. This training will include instruction on the types of containers to be used, the proper labeling of those containers, and personal protective equipment that must be used when handling such chemicals.

Employees will be trained on the requirements of fire prevention and fire protection equipment to be used including fire extinguisher selection, use, and care.

Training will be given on personal protective equipment to be used including proper clothing, shoes, hardhats, glasses, gloves, etc.

A sufficient number of supervisors will be trained as often as necessary to ensure that medical and first aid treatment may be administered to injured employees in cases of emergency. This formal training in first aid and CPR will be acquired through outside agencies such as the American Heart Association. All employees who successfully complete the training will be required to carry proof of certification at all times. Those employees who are certified in first aid and CPR should wear a sticker on their hardhat at all times so that they will be easily recognizable to other employees in an emergency.

Employees will be trained in the proper recognition and use of accident prevention signs and tags in the workplace.


Employees will be trained on the dangers of substance abuse in the workplace.

Training will be provided on machine guarding for tools and equipment used in the workplace.

- **HAZARD COMMUNICATION**

Hazard Communication is based on the "Right to Know Law" that ensures employees are not unknowingly exposed to chemicals that may be harmful.

Each new employee will receive hazard communication training before entering the workplace.

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This training will include a brief overview of the requirements of the OSHA standard on hazard communication. The training will also include instruction on how to read the Safety Data Sheets (SDS), how to recognize a release of hazardous chemicals, and how to deal with such situations safely.

The employees will be trained in the proper use of personal protective equipment when working with chemicals. They will be trained in the GHS labeling system, and will be informed of the location of the HazCom program, chemical inventory sheets, and SDS's at all times.

Employees are encouraged to review the HazCom package at any time. Any questions should be referred to their supervisor. More information on HazCom training is included in the written HazCom program.

The Hazard Communication Policy should be maintained in a separate folder to make it easier to distribute to employees, contractors, etc.

HazCom training updates will be delivered often during regularly scheduled safety meetings.


- **PRE-TASK PLAN (PTP)/SAFETY MEETINGS**

PTPs are to be conducted with all employees before each shift begins to focus each member's attention on safety at the beginning of each day.

These meetings are to be documented showing the topics discussed, employees' recommendations, and signatures of each person in attendance. Document these meetings on the PTP form.

Weekly Toolbox meetings are to be conducted at the beginning of each week. It is recommended that previous weeks safety audit be used as a guideline to address findings and update employees on procedures and expectations.

Management/Supervision shall meet on a quarterly basis for the purpose of reviewing safety problems and correction. These meetings will be an opportunity to discuss training needs, safety inspection results, statistical updates, accidents, and their related costs to the association, etc. These meetings shall be documented.

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CRISIS CHECKLIST (Also see Section 8 Incident Investigation and Reporting)

For accidents that involve serious employee injury

ASSIGNMENT OF RESPONSIBILITY:

F = responsibility of the Project Superintendent in the Field

O = responsibility of the Main Office

Note that several of the activities listed may be concurrent activities by different company employees. If the person responsible above is not in the Field or Main Office at the time of the accident, then until that person returns, the highest ranking company employee in the Field or Main Office at the time of the accident is responsible.

F1. CALL AMBULANCE – The ambulance driver will need the physical address of the project. Call plant security or plant emergency assistance, the controlling contractor, or 911 for ambulance service. Our priority is to obtain medical assistance for the injured employee.

F2. CALL CONTROLLING CONTRACTOR and give them the name of the injured employee.

F3. DIRECT AMBULANCE TO INJURED EMPLOYEE – Dispatch a foreman or other trusted member to the gate to help direct emergency vehicles to the injured member and to find out the name of the hospital to which the injured employee will be taken.


F4. ASSESS INJURIES – If it appears likely that the employee has internal injuries, do not move the member until the emergency medical team arrives.

F5. SECURE ACCIDENT AREA AND IDENTIFY WITNESSES – Instruct a foreman or other trusted employee to secure the accident area, write down names of witnesses, and ask witnesses to stay on site until statements can be arranged. If practical, install red barricade tape around the accident area. Keep everyone out of the accident area and preserve it as it was at the time of the accident, unless the area must be disturbed to provide entry to the injured member by emergency vehicles or the emergency medical team.

F6. CALL MAIN OFFICE

Discuss:

- Notification of emergency contact
- Whether or not to shut down work (area or project)
- Dispatch of company representative to hospital
- Dispatch of main office representative to accident site
- Accident investigation and information needed by Main Office
- First Report of Injury filing / Description of accident
- Witnesses

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F7/O1. NOTIFY EMERGENCY CONTACT – Call the emergency contact person at the phone number listed on your Emergency Contacts List.

F8/O2. INVESTIGATE THE ACCIDENT – Gather and safeguard documents relative to the injured employee’s application, orientation, and any training documents that were signed by the member. Witness statements – ask witnesses to write out a description of the accident and sign the statement, or record the statements on audio tape.

O3. CONSULTANTS – Decide whether to call in consultants to supplement the accident investigation.

O4. INSURANCE CARRIERS – Contact the worker’s compensation insurance carrier or agent. If the accident appears to involve other contractors on site or the general public, contact the general liability insurance carrier or agent.

O5. COORDINATE COLLECTION AND RELEASE OF INFORMATION – After the initial responses by the Field, file First Report of Injury and respond to requests for information and assistance from doctors, hospitals, insurance carriers or agents, and others.

O6. OSHA – Notify OSHA area office within 8 hours of accident or first knowledge of accident if it involves a fatality or inpatient hospitalization of 3 or more of the companies employees. If phone number of OSHA area office is not known, obtain zip code of project site, then call OSHA at (800) 321-6742 (you will be automatically transferred to the appropriate area office).