BCCI – CODE of SAFE WORK PRACTICES

20 March 2023

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The Thinking's Built In

BCCI Construction, LLC | LICENSE NO. 492944
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AUTHENTICATION

Approval Authority
Signature: *Michael Scribner*
Title: *Chief Executive Officer*
Date: 13 February 2023

Approval Authority
Signature: *Matty Kernen*
Title: Director of Safety
Date: 13 February 2023

NOTE: *Authentication occurs upon acceptance and approval of the document's contents by BCCI Construction, LLC authority prior to the issuance of this document in the final format. Authentication is NOT required at any point during the DRAFT stage.*

PREFACE

This document establishes the requirements and responsibilities of personnel employed by BCCI Construction, LLC.

This document is an evolutionary document – meaning, as requirements change so shall this document. When a new requirement is implemented or a requirement changes, under delegation from Senior Leaders, the BCCI Director of Safety must review, annotate, and sign the" Record of Changes" indicating this document have been reviewed and accept all changes.

RECORD of CHANGES

A = ADDED	*M = MODIFIED*	*D = DELETED*

Change No.	***Date***	***Pg No., Table, Paragraph***	***A M D***	***Title or Brief Description of Change***	***Initials***
01	20180601	Entire Document	M	Spelling and Grammar	MSK
02	20190104	Entire Document	M	Spelling and Grammar	MSK
03	20200601	Entire Document	M	Validation & Verification	MSK
04	20210204	Entire Document	M	Spelling, Grammar, Verification	MSK
05	20221001	Entire Document	M	Spelling, Grammar, Verification	MSK
06	20230123	Entire Document	M	Entire Rewrite	MSK
07	20230213	Section 3.0	M	Update C19 Prevention Pgm	MSK
08	20230320	Entire Document	M	Re-Align Page Numbers	MSK

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1.0 BCCI CONSTRUSTION, LLC – COMMITMENT TO SAFETY

BCCI Construction, LLC considers a successful safety, health, and environmental management program of primary significance to our business. We are committed to continual improvement of our safety, health, and environmental performance along with advancement of safety, health, and environmental standards. Our overall goal is to protect personnel, assets, and the environment. BCCI recognizes attaining the absolute goal of causing NO harm to anyone or the environment, which is extremely challenging; however, we will work with our clients, partners, suppliers, trades, and workforce towards achieving this goal while providing a safe and healthful work environment.

The Policy of BCCI Construction, LLC is to:

- Pursue the highest of standards regarding safety, health, and environmental management as an integral part of efficient business management requirements.

- Observe and adhere to ALL Federal, State, and Local Standards to include Regulations which are applicable to our industry.

- Develop, Implement, and Facilitate Construction Systems and Procedures which set effective safety, health, and environmental standards, while Inspecting, Initiating, & Auditing Construction Operations for Worker, Client, & Public Safety.

- Establish practices & procedures to address the selection and performance of all Sub-Contractors performing contractual obligation with BCCI Construction, LLC Projects.

  Develop and review safety and health performance indicators through the following:

  - Accident and Incident Matrix, BCCI Construction Employee Training.
  - Sub-Contractor Pre-Qualification and Performance.
  - Safety Inspection Findings of our Projects.

- The Safety Division of BCCI Construction, LLC will provide the following:

  - Coaching, Mentoring, Education, and Training.
  - Perform Inspections of ALL BCCI Projects & Investigate all Accidents, Incidents, Exposures, and Near-Misses.
  - Review Standards, Deviations, Waivers, Variances, and Regulations.
  - Provide revisions to the Safety Manual, Injury Illness Prevention Program, (IIPP), and Policies as required.

- Develop, Implement, and Improve the Safety 360° initiatives with our Staff and Partners.

Michael Scribner
Chief Executive Officer (CEO)

1.1 SAFTY 360° CULTURE of BCCI CONSTRUCTION, LLC

Our Safety 360° initiative is a pillar of our identity as a company. We believe our employees and partners should never worry about returning home safely nor should our clients ever have to worry about their safety.

Our approach to Safety is different as for us safety is a passion and not an obligation. Every employee within BCCI receives coaching, mentoring, education, and training from dedicated and experience Safety Division. This informative approach includes role plays of tailored scenarios to specific environments, lesson-learned discussions, new best practices, and leadership training so every employee is engaged and becomes a single voice of safety via a unified front. As we move forward, we have expectations of growth and innovation from our employees, teams, partners, etc. which range from the adoption of new technology to the testing of cutting-edge emergency and safety measures.

Our investment in safety, health, and environmental management benefits our clients who avoid safety-related impacts to their projects. Another benefit is clients are assured their safety and the safety of their visitors.

FOUR KEY COMPONENTS of SAFETY 360°

AWARENESS:
The Program fosters a 360° view of safety, physical and philosophically. We expect active engagement from all employees in their immediate environment, as well as awareness of what is happening around them (Situational Awareness). It also means we look out for one another's physical and mental safety, and ensure every employee and worker is empowered to have a voice.

SHARE RESPONSIBILITY:
Every employee receives coaching, mentoring, education, and training. We believe this is the best way to increase awareness and action as to increase responsibility, so our Superintendents, Project Managers, and others are as engaged in safety as our dedicated and professional Safety Division.

BEHAVIOR:
The Primary Contributing factor for over 80% of all accidents is Behavior. Pause and having this in mind, our primary goal of Safety 360° approach is to avoid risky behaviors altogether. Through a behavior-based safety education, we are coaching and mentoring our staff to take a more proactive stance and role, while supporting a strong safety culture which solicits feedback, engages the workforce, and provides empowerment to make a difference.

POSITIVITY:
This specific pillar relies on positive reinforcement to inspire everyone at all levels to achieve the highest levels of safety. Continuous feedback, engagement, and coaching are the pillar's core strength and drive, which drives our efforts to foster a lasting and positive safety culture across the organization, supporting the moto of Safety 360° of Everybody, Everywhere, Everyday.

1.2 CODE of CONDUCT

BCCI Construction, LLC in conjunction with Structure Tone are committed to maintaining the highest standards of business ethics and corporate conduct. As an employee, you are required to do the same. Responsibility for the company's commitment to ethical business conduct rests with you. If you are part of the Structure Tone family, you are a caretaker of the Company's most precious asset, its reputation.

Common sense, good judgment, and appropriate personal behavior are the responsibility of each employee. Conflicts of interest must be scrupulously avoided. You must perform all aspects of your work with the utmost honesty and transparency. You must keep complete records which accurately reflect the business of the company. In short, your daily activities on behalf of Structure Tone must reflect a personal commitment to conducting business in "The BCCI Construction, LLC Way."

This Code of Conduct and Business Ethics (the "Code") identifies the fundamental requirements for compliance with BCCI & Structure Tone's standards. All employees must familiarize themselves with the ethical and legal principles contained in the Code and make a personal commitment to abide by them. The Code applies to all BCCI employees' and all agents, consultants, contracted labor, and others when they are acting for, or on behalf of BCCI. This Code also applies to the Company's vendors, sub-contractors, suppliers, and other business partners. We must only work with companies who uphold our values.

The purpose of the Code is to help all of us understand the legal and ethical guidelines which govern the way we conduct our business. This Code (which we will update periodically as to remains current) is complemented by a suite of other policies and procedures that further guide our corporate behavior. BCCI & Structure Tone recognizes the complexity of everyday business life is such where a code of conduct can only provide the framework for our corporate responsibility. Questions and issues will arise and require the exercise of prudent judgment and common sense.

Conducting our business with integrity and ethics is the only way to ensure the long-term success of our Company, our clients, and our employees around the world. I cannot stress strongly enough BCCI does not, and will not, tolerate any form of unethical or unlawful behavior by any person or entity associated with the Company. Violations of the Code of Conduct, applicable laws, and of the Company's policies and procedures, as well as the failure to report any such violations, can be grounds for disciplinary action, including termination.

FUNDAMENTAL PRINICPALS

This Code is meant to provide guidance on our core values. Of course, one document cannot provide complete guidance on all your daily actions and interactions. This Code should be read and followed in conjunction with the Company's other policies and procedures under the guidance of your supervisors. The Code is also not a substitute for exercising common sense and prudent judgment, and for asking for support when you need it.

Employees receive a copy of the Code and training regarding the contents and application. All employees must know, understand, and comply with the requirements of the Code. Your compliance with this Code will factor into your performance evaluations, and non-compliance may have serious consequences, including termination.

Likewise, supervisors are held responsible for ensuring the Code is observed, and their own performance evaluations will incorporate their subordinates' records of compliance. Our leaders serve as role models and resources for proper business conduct, and they will be held accountable for subordinate conduct that they know or should have known exists and violates this Code. For those reasons they have enhanced responsibilities and must promote a culture of ethics and compliance. Our leaders must:

- Lead by Example & Ensure their Subordinates are knowledgeable about this Code & receive adequate training
- Foster an Environment of Integrity, Transparency, Honesty, and Open Communication & Promote Respect for Compliance with applicable laws & Company Policies & Procedures
- Deter Non-Compliant Behavior, and Report Suspected Violations

All Employees have a duty to speak up and promptly report any suspected violation of this Code, the Company's other policies and procedures, and applicable laws and regulations, including violations by the Company's business partners. Depending on their type and seriousness, and in accordance with this Code, you may report suspected violations to your immediate supervisor, local Human Resources ("HR") representative, the Company's General Counsel, the Company's Chief Ethics and Compliance Officer ("CECO"), or the Compliance and Ethics intake email address: Compliance@structuretone.com. Supervisors have a duty to ensure that reports of suspected violations made to them are promptly escalated and otherwise handled in accordance with this Code. You may also report suspected violations anonymously through the Company's third-party reporting service.

The Company will investigate all reports promptly, thoroughly, and consistent with applicable law. Investigations will be kept confidential to the extent possible and consistent with applicable law. When necessary and consistent with applicable law, investigations or the results of investigations may be reported to law enforcement or to a client. The Company will take appropriate disciplinary action if a report is substantiated and a Code, Company policy, or legal violation is found.

BCCI maintains a strict non-retaliation policy to protect those who report in good faith suspected violations of this Code, Company policies and procedures, or applicable law. "Good faith" does not require the conduct be substantiated; rather it means only you come forward with all the information you had and made a sincere and honest report. BCCI will not tolerate conduct which deters employees from raising genuine concerns or interferes with employees' duty to report violations. Allegations of intimidation or retaliation will be investigated and, where substantiated, met with severe discipline up to and including immediate termination. If you suspect you have been the victim of retaliatory behavior, you should report the matter immediately. All project sites are required to have displayed the following Compliance Department/Ethics Helpline information:

1.3 GENERAL CONSTRUCTION AND SAFETY RESPONSIBILITIES

BCCI Construction, LLC strives to provide a safe and healthful work environment for all its employees, the owner, the public, workforce, and other contracting firms on all BCCI Construction project sites. It is our intention, both in spirit and in deed, to abide by all Federal, State, and Local Standards as they may pertain to the construction industry. Safety training, the recognition of hazards, documentation, inspections, abatement of unsafe conditions and compliance are the focus of this Safety Program.

Every BCCI Supervisor shall maintain a safe and healthful workplace while contributing to a safe project site, to preserve our professional image of excellence in construction safety. With respect to BCCI employees, the communities which surround our project sites, and the Federal, State, and Local Agencies with whom we interface, the BCCI Construction Safety Policy shall have the full support of management from the Chief Executive Officer down throughout the entire company.

- BCCI Construction will appoint competent safety and health superintendents or safety managers with duties outline in the policy document of this manual.

- This manual aids in the compliance with California Code of Regulation (CCR), Title 8 (Cal-OSHA Stds.) and 29 Code of Federal Regulation 1926 (OSHA Construction Std) and any other safety standards or regulations not covered by the regulations. The purpose and intent of this content is to make available to BCCI Personnel reasonably accurate and authoritative information concerning project safety. At no time is this program a substitute for sub-contractor safety programs, which must meet or exceed the requirements specified herein.

- The maintenance of safety operations and elimination of unsafe practices and conditions remains the responsibility of BCCI sub-contractors. BCCI does not direct, control, or supervise the actual performance of the sub-contractor scopes of work. BCCI does perform minimal self-performed work. The information provided in this manual is available to sub-contractors to assist them in regulatory compliance.

- The BCCI Construction, LLC Health and Safety Manual is a guidance document to manage all BCCI projects. Certain elements of these programs may not be applicable to all types of projects.

- The BCCI Director of Safety has the authority and option to modify or develop program elements as they relate to this manual based on specific needs.

- BCCI is dedicated to the pursuit of safety excellent through the continuous improvement of the safety program via the enforcement of safety compliance and the elimination or minimization of exposure to hazards on all projects. ALL sub-contractors are required to recognize and abate unsafe jobsite conditions and behaviors.

- Sub-Contractors are required to abide by their submitted safety program. Additionally, each sub-contractor is required to comply with any additional BCCI or Owner imposed safety requirements, regulations, or standards.

- When there are other current industry standards or safe work practices (e.g., Joint Commission, NFPA, ANSI, etc.) or safe work practices will be followed. When more than one standard applies to any situation, the most stringent will have the prevailing authority.

- Our BCCI Code of Safe Work Practices (aka Safety Manual) attempts to state the most accepted regulatory work practices and spell them out in plain language to emphasize their importance.

- The possession, sale, use, or distribution of narcotics or related paraphernalia, alcohol (all related beverages) or other illegal substances or drugs are prohibited on the project. Any person found in violation are subject to disciplinary action up to and discharge from the project and future BCCI projects. The possession of firearms, explosives, or other weapons used to cause harm to personnel or property, other than used to perform specific construction activities, are not permitted on any BCCI project. Any person found in violation of this policy will be subject to disciplinary action up to and discharge from the project and future BCCI projects.

- The possession of firearms, explosives, or other weapons used to cause harm to personnel or property, other than used to perform specific construction activities, are not permitted on any BCCI project. Any person found in violation of this policy will be subject to disciplinary action up to and discharge from the project and future BCCI projects.

- Harassment/violence will not be tolerated based on someone's sex, age, race, color, religion, creed, sexual preference or orientation, marital status, national origin, ancestry, citizenship, military status, veteran status, handicap or disability or any other protected group or status nor displaying of lewd or offensive pictures, graphics, or gestures. Report all conditions relating to this policy to the BCCI superintendent for review, investigation, and resolution, which may subject the offender to immediate removal from the jobsite by their employer and no return to any BCCI projects.

- Each sub-contractor shall appoint a safety representative as the Competent Person with a minimum of OSHA 30 training. This individual must have the ability to recognize hazards in the work environment and shall have the authority to take prompt corrective action, as set forth by OSHA 29 CFR 1926.32(f).

- If required by BCCI, Structure Tone, or the Client, any sub-contractor with 25 or more employees including tiered sub-contractor employees, shall have a full-time dedicated safety manager with a minimum of OSHA-30 training within the past five (5) years.

- Prior to start of work, the sub-contractor shall submit a letter identifying all competent persons, qualified persons and/or authorized persons responsible for each aspect of their work. The respective sub-contractor principal shall complete all appropriate BCCI prescribed forms relating to this designation.

- Sub-contractors shall designate a competent corporate safety representative (from management) at the beginning of the job who shall inspect the jobsite at regular intervals as required by OSHA. This representative must coordinate inspection efforts and abatement of noted deficiencies with the BCCI Superintendent, BCCI Director of Safety or BCCI Safety Manager, as appropriate.

- Sub-contractors are to conduct pre-planning meetings with written documentation for all high-risk activities. The Sub-contractor as required will conduct a Job Hazard Analysis (JHA). BCCI must be notified three (3) weeks prior to any known or planned high risk activities, critical crane lifts, scaffolding, demolition, excavation, fire or smoke potential or activity with potential for severe injury or death. Pre-planning meetings are required as necessary to satisfy the duty of reasonable care.

- Sub-contractors key personnel are required to attend a pre-mobilization meeting.

- Sub-contractors shall maintain all required OSHA documentation and data prior to the start of work and through the duration of their contracted work. This includes at a minimum, a written Site-Specific Safety & Health Program, OSHA 300A Summary form, identity of their designated Competent Person(s), name of designated Management safety representative and all certifications, licenses, credentials, and training records for their employees. Forward a copy of these documents to BCCI Director of Safety and Project Team upon the initial arrival of each employee, as BCCI does reserve the right to accept or reject the adequacy of such documents.

- Sub-contractors are to report all incidents, near-miss, occupational illnesses, and accidents to the BCCI Superintendent immediately. Sub-contractors must provide all associated documentation to BCCI Construction, LLC by end of shift, which includes the 7-Step Post Incident Review for Serious or Lost Time Injuries.

- BCCI Jobsite Safety Orientation and Safety 360° training is required upon entry for all personnel prior to the start of work on the day they arrive. This training is in the form of a QR Code, which resides with the BCCI Superintendent.

- Failure by the sub-contractor to meet or exceed the standards of the BCCI Construction, LLC Safety Police, Code of Safe Work Practices, Pre-Planning meetings, or other imposed safety elements; this subjects the sub-contractor to remedies under the subcontract, to include default.

- All personnel must report to the field office upon initial first day, all visitors will report to the field office and sign a Visitor Release Form. All visitors are required to wear appropriate clothing to include sturdy work boots, hard hats, and safety glasses 100% of the time on the project.

- Sub-Contractor Site Specific Safety Procedures will meet or exceed the more stringent requirements of OSHA and BCCI Construction or their own policy.

- BCCI Construction has a Fall Protection Requirement for all Operations or Work which is above six (6) feet. (Federal OSHA Fall Protection Rule which is more stringent).

- BCCI uses a Guardrail Disruption Permit for any Guardrail System around any wall opening or open hole on the project. Sub-Contractors who perform work in these areas must procure this Permit from the BCCI Superintendent.

- Each sub-contractor must ensure the onsite foreman, superintendent, or supervisor has successfully completed a First Aid, CPR, AED certification and is current.

- BCCI Construction, LLC has adopted a ZERO TOLERANCE POLICY towards compliance with Fall Protection, Electrical Safety, NFPA 70E Requirements, Hazardous Energy (LOTO), Confined Space, Excavation, Trenching, Harassment, Workplace Violence, and Smoking / Vaping / Chewing Tobacco, which include electronic cigarettes and electronic vaporizers (Reference Section XX). Each sub-contractor must be responsible for enforcing this Policy throughout their respective scope of work.

- The BCCI Director of Safety will have full authority and final determination in the sub-contractor's compliance with the Safety Program.

BCCI CONSTRUCTION, LLC RESPONSIBILITIES

DIRECTOR of SAFETY / SAFETY COORDINATOR

- Direct, Administer, Develop, Implement, Facilitate, Execute, and Monitor BCCI Construction, LLC Safety Policies, Programs, and ensure compliance with the requirements of this manual.

- Determine training needs for all BCCI Construction, LLC employees and provide the necessary training to achieve implementation of safety on all project sites.

- Develop a system to evaluate and report incidents, near-misses, accidents, occupational illness, property damage, or general liability claims.

- Provide representation of BCCI Construction, LLC with appointed legal counsel in BCCI and Structure Tone Legal Defense.

- Direct, Manage, and Administer the BCCI Safety Division to include evaluation of which projects require additional safety attention and staff accordingly.

- Conduct or assist in all accident, near-miss, incidents, etc. investigations and report findings, cause, and recommendations directly to the Chief Executive Officer, President, Chief Operations Officer, and in-house Counsel.

- Act as an advisor to line management or related supervision on each BCCI Project and provide technical support and expertise for all Safety and Health Requirements.

- Perform and Manage onsite safety audits ensuring compliance with safety and health standards as required by Cal-OSHA and Federal OSHA, Federal, State, County, and Local Laws, Standards, Regulations, Variances, Deviations, and Waivers; to include other regulatory commissions as required.

- Collaborate with OSHA, Cal-OSHA, other Safety Inspectors, and Insurance Safety Representatives to evaluate and abate unsafe conditions and improve the implementation of safety on the project sites.

- Develop Health and Safety Plans (HASPs) and procedures, which are project specific to the project. The intent is to identify areas which contain emergency response, hazard communication, procedures for safety, COVID-19 protocols, etc.

- Represent BCCI Construction, LLC and Safety Programs at owner and community meetings and include sub-contractors as required. Collaborate with clients to coordinate safety efforts and implement accordingly.

- Track, Monitor, and Trend sub-contractor compliance on all BCCI Projects. Coordinate with sub-contractor principals on the improvement of their level of safety performance.

- Maintain a strategic overview of the implementation and facilitation of safe work practices within the industry to include Safety 360°.

- Establish, Enforce, and Implement Corrective Actions of Recommendations, which were contributing factors or causes in causing occupational injuries.

- All incidents, accidents, near-miss, or occupational illness will be disseminated and coordinated with BCCI Risk & Human Resource Managers for the management of Workman's Compensation (WC) Claims.

- Establish and maintain all levels of communication with all levels of leadership and management ensuring each division is aware of the BCCI Safety and Health policies and protocols, which define the responsibilities and empowerment to the programs and regulatory statutes.

PROJECT MANAGERS

- Assist in the administration and management to the overall Safety program on the BCCI Project. This is accomplished in coordination with the Director of Safety or Safety Manager and include the collection of all sub-contractor OSHA compliance dat as part of the submittal process.

- Sustain and support the Project Teams efforts in ensuring safety compliance at the project and work with BCCI Director of Safety for compliance.

- Assist Director of Safety in investigations of all personnel, equipment, and property incidents or accidents for the intended purpose of reducing the risk or recurrence.

- Attend and sign-in at the project weekly safety meetings and accompany the Safety Division on project audits.

- Participate in the Pre-Planning meeting of High-Risk Activities and in the sub-contractor meetings inviting sub-contractor safety representatives and BCCI Safety Division.

- Provide full support to the Superintendent on the enforcement of Sub-Contractor Safety Compliance through documentation and meetings, which includes notification to the BCCI Director of Safety.

- Attend all necessary BCCI Safety Training Sessions to ensure compliance and understand the BCCI Construction, LLC Safety, Health, and Environmental Policies and Procedures for the execution thereof.

- Ensure all the safety and reporting requirements of the jobsite are met and enforced.

- Assist the Project Team and Director of Safety in the implementation and execution of the Safety 360° Program at the project site.

SUPERINTENDENTS

- Manage and implement the overall Safety Program of the projects, including the assurance all sub-contractors are adhering to their submitted safety program, BCCI, and Owner Safety Program.

- Ensure Completion of OSHA-30 Hour Construction Safety Course within the last 5-Years and are First Aid / CPR / AED Certification is current.

- Plan & execute all work to minimize jobsite hazards & comply with the BCCI Safety Program, and complete Weekly Safety Inspection and inform Safety Division upon completion of any findings or corrective actions taken.

- Enforce all provisions of the contract dealing specially with safety & incident prevention

- Cooperate with insurance representatives having insurance coverage of the projects.

- Direct, Coordinate, & Collaborate the Correction of Unsafe conditions & hazards which are in plain view, reported, or observed.

- Host and attend the weekly Safety Meeting and Audit.

- Submit all paperwork and documentation to the Director of Safety as required.

- On a day-to-day basis, enforce safety compliance on all sub-contractors at the project.

- Ensure all sub-contractor personnel complete the Job Safety Orientation and Safety 360° prior to the start of any work via the issued QR Code.

- Meet with Local EMS Officials and Director of Safety to review access to the project in the event of an emergency or natural disaster.

- In the event of any incident, accident, near-miss, or occupational illness, inform the BCCI Director of Safety and Project Team immediately, which also includes any serious mishap.

- Submit all subsequent Accident / Incident Forms and participate in any form of investigations as required.

- Maintain and enter all Daily Logs to include workforce logs into ProCore by the beginning of each month.

- Accompany Owner and other Regulatory Agencies Inspectors during project inspections.

- Ensure all personnel onsite are compliant with Owner Site-Specific Requirements.
- Implement and Manage the Hot Work Permit Process of the Owner or BCCI.
- Coordinate and Ensure compliance with all Fire Protection Requirements.
- Coordinate with the Owner, Project Management, Chief Engineer, and BCCI on all utility interruptions and generate a Method of Operating Procedure (MOP) from the appropriate sub-contractor and submit to the BCCI Director of Safety for Final Review and Approval.
- Host and participate in the pre-task-planning meetings of all High-Risk Activities to ensure exposure and hazards are mitigated or eliminated prior to the start of work.
- Immediately notify the BCCI Director of Safety whenever Federal, State, or Local Agency Representative arrive on the project site.
- Coordinate, implement, and execute in conjunction with the projects team the Safety 360° Program.
- During the weekly foreman's meeting, discuss the critical (High-Risk) Activities which are to occur over the next 30-days.

SUB-CONTRACTOR RESPONSIBILITIES

To the extent which a sub-contractor of any tier performs any scope of work, they assume responsibility for compliance within the provisions of the BCCI Construction, LLC Safety, Health and Environmental Policies and Procedures and their Injury Illness Prevention Program (IIPP) and Code of Safe Work Practices (aka Safety Manual). The sub-contractor has the responsibility for the participation and enforcement the project Health & Safety Plan (HASP). The sub-contractor shall cooperate fully with BCCI Owner, and all other representatives and insurance representatives with respect to loss and accident prevention. There is NO substitute for the exercise of good professional judgment.

- Sub-Contractor shall perform the scope of work within their contract while assuming responsibility for compliance with all Federal, State, & Local Standards, Regulations, Rules, or Guidelines.
- Sub-Contractor shall maintain a current and compliant copy of their safety program on the project and ensure this documentation is available upon request; however, the most stringent will apply.
- Sub-Contractor shall plan and execute all work operations in compliance with the stated objectives of the HASP, Policies, and Procedures.
- Sub-Contractor shall attend all scheduled weekly BCCI safety meetings as required.
- Sub-Contractor shall attend all scheduled weekly Foreman's Meeting and b discuss any High-Risk Activities which may occur within the next 30-days on any BCCI Project.

- Sub-Contractor shall implement immediate Corrective Actions to eliminate any unsafe practices and conditions when observed or report / submit a Corrective Action with a photo to the BCCI Project Team and Director of Safety. Sub-Contractor shall provide Personal Protective Equipment (PPE) to their employees at the project, which is needed, required, and to utilize all equipment / tools.

- All Sub-Contractor must adhere & enforce the BCCI Project Site PPE requirements to enter and work on the project site (e.g., work boots, high-visibility clothing or reflective vest, safety glasses, and hard hat).

- Sub-Contractor shall take immediate action for non-compliance, which shall include removal from the project, with potential removal from all BCCI projects, for refusal to wear and utilize provided PPE.

- Sub-Contractor Safety Representative shall investigate all events resulting in personal injury, illness, hospitalization, fire, property damage, etc. All Findings, Causes, & Recommendations will be submitted to the BCCI Director of Safety within twenty-four (24) hours along with all documentation (e.g., Incident Report, Witness Statements, Photos, etc.)

- Sub-Contractor shall provide adequate safety measure against any occupational illness or disease exposure (e.g., gases, fumes, dusts, chemicals, noise levels, etc.) which may cause injury to the project workforce.

- Federal & State Regulations require each employer to have a Hazard Communication (HAZCOM) Program. This requires a library of Safety Data Sheets (SDSs) for all materials incorporated into the construction process. The sub-contractor shall submit all SDSs a minimum of 5 days prior to bringing onto the project to BCCI Director of Safety to ensure compliance with California Proposition 65.

- In connection with all work performed hereunder, the sub-contractor shall include provisions for and comply with all Safety and Health Regulations of the Occupational Safety and Health Act of 1970 (29 CFR. 1926) and Title 8 of the California Code of Regulations (CCR), including all amendments and modifications. In the event there is a conflict between the safety and health provisions of Federal, State, or Local Standards and Regulations, the more stringent provision shall prevail. The sub-contractor acknowledges and agrees with respect to the scope of work under the subcontract, it shall comply with all obligations and assume all responsibilities imposed upon and through the “controlling contractor” as such term is defined and construed under all OSHA & Cal-OSHA Rules and Regulations.

- In accordance with the terms and conditions of the contract, BCCI Construction, LLC & Structure Tone reserves the right to take appropriate actions to remedy sub-contractor or sub-sub-contractor non-compliance with these safety requirements at the sub-contractor's expense.

- The sub-contractor shall submit all emergency contacts (name, telephone, e-Mail) for the Safety Director, Manager, or Coordinator; along with Senior Operations Personnel who are available 24/7 to the BCCI Director of Safety.

- Sub-Contractor shall appoint and submit in writing the name of their Competent Person who is qualified by training and experience to recognize and anticipate predictable hazards and has the authority to take prompt corrective action to abate them and must have the authority to stop work of his/her work forces in the event of a safety issue.

- Sub-Contractor shall perform safety inspections and take Corrective Actions for recognized hazards, report unsafe conditions, and provide a copy of their report to the BCCI Director of Safety.

- Sub-Contractor shall comply with the recordkeeping and procedural requirements of OSHA, BCCI, and Structure Tone and the insurance carrier related to accident reporting and investigation. Document loss control data involving personnel, equipment, and property.

- Sub-Contractor shall comply with the recordkeeping and procedural requirements of OSHA, BCCI, and Structure Tone and the insurance carrier related to accident reporting and investigation. Document loss control data involving personnel, equipment, and property.

- When a designated site safety manager is required by contract; the following criteria must be met:

    - Completion of OSHA-30 Hour Construction Safety Course within the last 5 years
    - Recognized by sub-contractor as a Competent Person IAW OSHA definitions
    - Can recognize and correct associated hazards within the scope of work

    - If BCCI Construction determines a Sub-Contractor's work is considered a High-Risk (e.g., crane lifts, unusual lifts, extensive scaffolding, demolition, excavation, fire, or smoke generating activities, concrete formwork, pre-cast concrete, steel erection, shaft work, confined space, work at heights, work at depths, etc.) the sub-contractor shall provide a written Job-Hazard Analysis (JHA), Job-Safety Analysis (JSA), or Pre-Task Plan (PTP). A joint meeting shall be held to determine the need for a full-time dedicated safety manager and review/coordinate the plan with the Owner or other subcontractors as required.

- Sub-Contractors with an onsite safety work history which DOES NOT meet BCCI's expectations shall be required to submit a Corrective Action Plan (CAP) and designate a full-time, onsite, dedicated safety professional meeting.

- The Foreman shall be prepare & submit a JHA, JSA, or PTP covering the day's work and working conditions, as required.

- The following rules are important to the safety of all personnel on the project and are to be enforced by sub-contractor management:

    - Employees are always situationally aware and report all unsafe conditions or acts, along with all accidents, to BCCI Construction, LLC immediately.

    - Possession or working under the influence of alcohol or drugs is prohibited and subject to immediate dismissal from the project and any future BCCI Projects.

- Firearms are prohibited on a project. Anyone found with such shall be subject to immediate dismissal and the authorities shall be notified.

- Workplace Violence (Fighting) on the job is cause for immediate dismissal.

- "Horseplay" and other inappropriate behaviors are prohibited.

- Zero tolerance is in effect for fall protection, Hazardous Energy, Respiratory Protection, Silica, non-OSHA compliant excavations, and NFPA 70E issues, even if discovered after the fact. Offenders will be removed from the project and re-trained prior to returning to the project.

- Exposure to a fall hazard greater than six (6') feet above a lower level. When an employee observes a fall hazard, they shall notify their supervisor of the hazard.

- The responsible sub-contractor shall immediately correct the hazard. 100% continuous Fall Protection, for fall hazards greater than six (6') feet, shall be implemented using hard barricades or personal fall arrest system.

- An operable Ground Fault Circuit Interrupter (GFCI) plugged in at the power source or a GFCI circuit breaker shall protect temporary power for all power tools and cord sets. If no GFCI outlets are available, the sub-contractor shall provide a GFCI "pigtail". Above 110 V, any cord and plug set shall be protected via GFCI or Assured Equipment Grounding Conductor Program (AEGCP).

- Site employees are to inspect all hand tools and extension cords prior to use. Any defective tools and extension cords discovered are to be taken out of service immediately and red tagged.

- The sub-contractor's Competent Person prior to use shall inspect other equipment, such as scaffolding and ladders for any defects. If equipment is defective or unserviceable, it is to be immediately brought to the attention of the supervisor and removed from service.

- Hot Work Permits and qualified full-time fire watch are required for all HOT WORK.

- Fire Protection Equipment are NOT to be tampered with or removed from assigned location.

- Obey "No Smoking, Vaping, and Chewing Tobacco" rules. Smoking, Vaping, and Chewing Tobacco are prohibited including electronic cigarettes and vaporizers throughout the job site.

- The use of gasoline is prohibited for the cleaning of equipment and tools or for starting fires. Gasoline engines shall be shut off and allowed to cool before refueling.

- The use of plastic gas cans for storing combustible/flammable liquids on the site is prohibited. Use only approved metal containers and store in appropriate flammable storage lockers.

- Hazard Communication and Hazardous Energy (LOTO) Programs shall be observed.

- Use approved respirators when conditions warrant and procedures in the Respiratory Protection Program are strictly followed; to include all personnel are properly FIT-Tested and Medically Cleared to wear a Respirator.

- Appropriate work attire shall always be worn:

    - Wear Personal Protective Equipment (PPE) supplied by the employer.

    - Hard Hats and Safety Glasses ANZI Rate are required 100%.

    - Wear gloves as required by task (e.g., handling objects / substances which could cut, tear, burn, or injure hands, etc.).

    - Wear high-visibility company clothing / safety vests on project site, reflective vests required in traffic or near heavy equipment operations.

    - Fluorescent (colors that are easily distinguishable from their background) outer garments shall be always worn.

- Maintaining good housekeeping is mandatory, clean as you go.

- Only authorized & properly trained employees shall operate machinery, equipment, vehicles, & tools.

- Assigned operator shall always operate vehicles in a safe manner.

- Utilize proper manual lifting techniques. Workers are not to lift or push heavy objects.

- Do not enter barricaded areas unless authorized.

- The use of portable FM/AM, iPod, and MP3 radios or other devices affecting the ability to hear emergency instructions and warnings on the site is strictly prohibited.

- Sub-Contractor shall comply with Respirable Crystalline Silica (RCS) 29 CFR 1926.1153 and CCR Title 8, § 1532 Standards; then provide silica training to ensure employee(s) can demonstrate knowledge and understanding of health hazards associated with exposure to RCS, specific tasks hazards associated with exposure to RCS, and measures which can be implemented including engineering controls, work practices, and respirators to be used.

VISITORS on PROJECT SITE

- All visitor(s) entering a BCCI Project must sign a Liability Release Form.
- BCCI Project Team retains singed release forms in a separate file at the Project Office.
- Personnel NOT required to sign a release form are:
    - BCCI and Structure Tone employees and sub-contractors
    - Owner, Architect, and Engineer employees to include their representatives
    - Representatives of any Governmental Agency on official business
    - Personnel delivering to sub-contractors working at the Project Site
- The following PPE must be observed during a site visit, including any other site-specific requirements:
    - Hard Hat, Safety Glasses, Reflective Vests, and Work Boots
    - Maintaining of Good Housekeeping is Mandatory
    - NO Open-Toed Shoes, Flats, Tennis Shoes, High Heels, Slingback, etc.
    - Adherence to all Warning Signs and Barricades required
    - Situational Awareness of and stay clear of overhead hazards
    - Smoking, Vaping, Chewing Tobacco, or other Tobacco products are PROHIBITED
    - Use caution on walking or uneven surfaces with impediments
    - Report any Hazard to BCCI Director of Safety, Safety Manager, or Superintendent
    - DO NOT Stray from the Approved path for ingress and egress
    - DO NOT enter areas with inadequate lighting
    - DO NOT touch, walk, lean, reach, or travel any handrails, barricades, guardrail system
    - DO NOT touch or walk on welding leads, wires, conduits of any kind
    - DO NOT enter unsafe areas where Fall Protection is required or does not exist

1.4 ZERO TOLERANCE POLICY

NOTE: Any Personnel discovered violating any of the identified Zero Tolerance Areas will be required to leave the Project Site Immediately, with a NO-RETURN to the Project Site or any other BCCI Projects.

GENERAL ISSUES

- Blatant DISREGARD for safety will result in immediate and permanent dismissal from the project, with potential permanent dismissal from any BCCI Project.
- Harassment will NOT be tolerated based on anyone's sex, age, race, color, religion, creed, sexual preference or orientation, marital status, national origin, ancestry, citizenship, military status, veteran status, handicap, disability, or any other protected groups or status.
- Displaying lewd or offensive pictures, graphics, or gestures
- Harassment of Verbal, physical, obscene, or vulgar gestures towards anyone or foul language in public or common areas.
- The possession of drugs, sale, use, distribution, related paraphernalia, alcohol (all related beverages), or other illegal substances or other evidence of impairment are NOT permitted on the project.
- The possession of firearms, explosives, or other weapons used to cause harm to personnel or property, other than those used to perform specific construction activities are NOT permitted on the project.
- Workplace Violence or Horseplay will NOT be tolerated on the project site.
- Smoking, Vaping, or Chewing Tobacco is PROHIBITED on the project site.
- Disregard for Life-or-Death Safety Programs (e.g., Respiratory Protection, Silica, Fall Protection, Hazardous Energy (LOTO), etc.
- Arrival to the project site inebriated.

FALL PROTECTION CONCERNS

- Workers observed in an unprotected or unguarded area without proper Fall Protection or Anchorage System.
- Disrupting a Guardrail System without an Approved Guardrail Disruption Permit from Superintendent.
- The use of an inadequate Fall Protection System or Anchorage Point.
- Removing a Hole Cover or Working in an area unprotected or insufficiently protected hole without appropriate Fall Protection System

SAFE ELECTRICAL WORK PRACTICE CONCERNS

- Working in an Active or HOT Panel.
- Any worker engaged in energized work of any type whether observed or discovered after the task as specified in NFPA 70E.
- Performing any form of electrical task without the appropriate PPE or NFPA 70E Category Suit.
- Failure to Follow Established APPROVED MOP Procedures.

EXCAVATIONS

- Working in any trench or excavation exceeding 5’ or more in depth without proper or approved shoring system.
- Perform excavation or trenching exceeding 5’ without the proper Cal-OSHA required annual permit.
- Not providing the appropriate means of egress from the trench or excavation.

1.5 SAFETY INSPECTIONS

BCCI INSPECTIONS

BCCI Construction Superintendents shall conduct a weekly safety inspection of their Project Site, submit, and communicate to the BCCI Director of Safety & Safety Manager which contains their findings, recommendations, and corrective actions taken to abate the identified item(s).

OUTSIDE AGENCY INSPECTIONS

- At various times, personnel will arrive and present their credentials to the Project Team requesting permissions to perform safety inspections or incident investigations. The following personnel are authorized:
    - Federal or State OSHA Compliance Officers or Representative.
    - Structure Tone, BCCI, or Insurance Representatives.
    - Owner, Architect, or Engineer Representatives.
    - Local Laborer's and Carpenter's Union Representatives.
    - Insurance Carriers who have coverage of the project.
    - State, County, or Local Municipal Governmental Agencies.
    - Environmental Protection Agency (EPA).
    - Third-Party Safety Consultants at the discretion of BCCI or Structure Tone.
- The Project Team shall admit the above personnel (1, a-h) only upon validation and verification of proper credentialing.
- All personnel wishing to perform safety inspection or incident investigations shall NOT be admitted without notification of BCCI Director of Safety and BCCI Senior Leadership (President, Chief Operations Officer, and Legal Counsel).
- Each sub-contractor must notify BCCI Superintendent of the presence of any safety inspectors from any of the agencies listed above.
- The BCCI Director of Safety, Superintendent, or Designated Representative shall escort any safety inspector and record and take photos of the observations the inspector has identified.
- Where observations appear to conflict with the site-specific safety policies and procedures, the matter shall be submitted to the BCCI Director of Safety and Project Team for resolution.
- Copies of safety reports, notices, or citations resulting from safety inspections shall be submitted to BCCI Construction Safety Division prior to departing the site.

1.6 OSHA INSPECTION or SITE VISIT PROCESS

The BCCI Project Team shall cooperate with all Authorized Safety Personnel and implement their recommendations for Corrective Actions on any identified Safety Hazard(s) unless they are in clear conflict with OSHA Standards or Company Safety Policies and Procedures. For clarification of any conflict(s), immediately contact our BCCI Director of Safety. The following information are detailed instructions of what to do during a Federal or Cal-OSHA Inspection or Investigation. A member of the BCCI Project Team or the Director of Safety must always accompany the OSHA Investigator or Compliance Officer and comply with the instruction of this manual, Director of Safety, Investigator, and Compliance Officer.

NOTE: Once OSHA has arrived onsite, immediately notification to the BCCI Director of Safety must be accomplished. Request the Compliance Officer or Investigator to wait for the site walk until BCCI Safety arrives. Typically, the OSHA Representative will grant a one (1) hour for arrival of Company Safety; however, it is their choice to wait or not.

HOW TO HANDLE AN OSHA INSPECTION or INVESTIGATION

This guidance is a brief introduction to the Occupational Safety and Health Administration (OSHA) Standards and to assist the BCCI Project Team in the understanding of their roles and responsibilities, and rights of the Compliance Officer or Investigator during an OSHA Visit or Inspection.

ARRIVAL ONSITE

- OSHA Compliance Officer (CO) arrives, receive introduction and request credentials.
- A member of the Project Team may call OSHA to validate and verify credentials.
- Without delay immediately contact the BCCI Director of Safety& advise CO onsite.
- As required by law, a hazard observed by OSHA, we are required to address an correct.
- BCCI Project Team must accompany the CO / Investigator for the duration of the visit or inspection.

NOTE: Ensure BCCI Director of Safety has been notified and enroute to the Project Site. As a reminder the CO / Investigator may allow up to one (1) hour for response.

- Always remain polite and professional. DO NOT be Defensive as this could be perceived as an obstruction to their visit or inspection.
- You may inquire if this visit or inspection is Scheduled, Compliance-Based, Referral, Mishap Related, or if the CO observed an imminent danger event.
- The CO is required to have an Opening Conference with the General Contractor (GC), Sub-Contractor Foreman, and Union Representation.

- In the Opening Conference the CO will explain the nature, purpose, and scope of the visit or inspection, and will direct the selection of employer and employee representation to accompany them during the inspection or visit.

- The CO will request information (*required to complete report*) of each employer to include sub-contractor to present (e.g., list of sub-contractors, supervisors name, and the 2d & 3d tier sub-contractors).

- The CO will indicate if this is a Focused Inspection, which is a limiting scope only inspecting the Fatal Four Hazards or a Comprehensive, which is full court press inspection of the entire project.

- Lastly, the CO is NOT required to sign a release or waiver for entry into the project.

INSPECTION or VISIT

- An authorized representative from each employer as representation of their employees may accompany the CO during the physical inspection of any workplace.

NOTE: This allowance is to provide an appropriate degree of involvement of employees and aid in the inspection. These employees have the right to point out hazards to the CO during the inspection / visit. Sub-Contractors are NOT permitted to designate an employee representative.

- For Unionized projects, the CO will request the Superintendent to assemble the Shop Stewards for each trade and enable them to select an employee representative from among themselves.

- For Non-Unionized projects, or where for any reason it cannot be determined with reasonable certainty who the employee representative will be, the CO is required to interview a reasonable number of employees from each employer and trade regarding safety conditions of the project.

- The CO may request to visit an area where they observed an alleged violation or complaint.

- During the inspection, remain professional and courteous as you if you would have visitor in your home.

- The CO may interview an employee who they observed exposed to a hazard as indicated in 29 CFR 1926 or CCR Title 8.

    - They have the right to interview the employee in private; however, the employee who is part of Organized Labor, has the right to have their Shop Steward present. Step aside and allow this interview to occur.

- Take notes and photos of the physical inspection, what specifically the CO was looking at. The below are guidelines:

    - If the CO takes a photograph; you do the same.

- Describe methods, materials, equipment, machinery, positing, and operation.
- Condition, ownership, applicability, dimensions, weights, make, model, & number in use.
- Exact location on the project (e.g., floor, room, column lines, etc.).
- Date and Time.
- Provide Diagrams (if necessary).
- Distances and heights.
- Weather Conditions.
- Identify those employees directly affected by the hazard(s) or involved in violations:
    - Describe type of work, employer, location, and number of employees.
- Identify Employees Interviewed by Compliance Officer:
    - Specify nature of discussion or complaint, trade, or employer.
- Describe all hazards or violation(s) corrected on the spot during the inspection with the Corrective Actions taken.
- Description of all tests and readings taken, along with what type of instrument.
- Record all samples taken (location specific).
- Describe all photographs taken and include subject, location, and direction.

- As part of this inspection process, the CO may want to look at the BCCI Construction or sub-contractor Code of Safe Work Practices, Training Certifications, OSHA 300 Logs, Safety Meeting Topics, Orientation Verifications, etc.

NOTE: All CO Requested MUST be handled and completed with a Sense of Urgency as these requests are Time Sensitive. BCCI Director of Safety will assist with these items.

THE CLOSING CONFERENCE

- The CO will conduct a Closing Conference with the BCCI Project Team, BCCI Director of Safety, and Sub-Contractor Foreman to review potential findings or citations.
- Request clarification and ensure you understand any issues or concerns, which may have arisen during the visit / inspection.

- The CO cannot issue citations, they can only recommend to the Area Director who is the authority (decision) for the issuance of citations. Citations could be received up to 6 months after the inspection / visit.

AFTER THE INSPECTION

- After departure of the CO, compile an After-Action Report for the BCCI Director of Safety to present to Senior Leadership. Record any deviation from the inspection procedures of the CO. Also provide a record of all persons attending the Opening and Closing Conferences.

- Provide a list of names of who participated in the inspection/visit walk. Additionally, include details of the conferences, inspection, and alleged violations.

- If the identity on any complaints is learned, NO retaliatory action can be taken, which can also be construed as discriminatory, and may result in additional fines and penalties.

- Any information requested by the CO (e.g., drawings, safety programs, etc.), inform the CO all these types of requests must be made formally. Request the CO send an e-Mail with their request to the BCCI Director of Safety.

- Upon receiving the request and the information is collected, the BCCI Director of Safety will respond to the formal request and all documentation will be sent to Cal-OSHA or Federal OSHA.

- Cal-OSHA and Federal OSHA have up to six (6) months to issue a citation to any sub-contractors or BCCI and most likely; any citation will be sent to the BCCI Construction, LLC main office, located in San Francisco, CA.

- Once citations are received, they are immediately to be given to the BCCI Director of Safety for processing and response.

- The GC or Sub-Contractor will receive only fifteen (15) days to request an informal conference where a good faith effort is established to reduce the monetary value of the fine or present a formal Notice of Contest at this conference.

NOTE: These Strategic Decision will be discussed with the Chief Executive Officer (CEO), President, Chief Operations Officer (COO), Chief of Strategy (COS), and Director of Safety within BCCI Construction, LLC. This body makes the final decision on all Safety Matters.

- The BCCI Director of Safety will carefully read and understand all instructions appearing on the citation, comply with abatement instructions, and report the details of corrective actions made to Senior Leadership. If abatement of any citation takes more than one-week to abate, the BCCI Director of Safety will coordinate with Cal-OSHA or Federal OSHA to provide weekly progress reports.

- After receipt of abatement details, follow-up inspections may occur to determine an employer's compliance with the abatement orders, even though the OSH Act provides for fines and penalties of any person making a false report about any form of abatement.

TYPES of INSPECTIONS

This information explains the procedures for a General Inspection; however, there may be special circumstances which may require Cal-OSHA or Federal OSHA to perform other types of inspections.

All the procedures applicable to a General Inspection are applicable to other types of inspections. The only exception are those inspections which will be limited in circumstance while performing a mishap investigation.

In this case the CO may determine the condition are such, which warrants a complete inspection of the workplace may occur. Prior to the expansion of the scope, the CO should telephone their supervisor for permission and should also notify the involved GC or sub-contractor of their intentions.

OTHER TYPES of INSPECTIONS

- Fatality or Catastrophic: the General Contractor or Sub-Contractor are required to report any work-related fatality, disfigurement, or amputation, within 8 hours to the nearest Federal OSHA or Cal-OSHA District Office. For a loss of an eye or hospitalization of a worker beyond observation notification must be made within 24 hours. Cal-OSHA and Federal OSHA are required to investigate all reported events.

- Follow-Up: Any citation issued for imminent danger, serious, willful, or repeated violation(s) require a mandatory follow-up inspection to determine the employer's compliance with abatement as called for in the citations. Follow-up inspections for non-serious violations are at the discretion of Cal-OSHA or Federal OSHA.

- Complaint: The OSH Act of 1970 affords employees or their representatives to report violations of the Safety and Health Standards to Cal-OSHA or Federal OSHA and request an inspection by either signing a written complaint or filing a complaint electronically through the respective site.

    - At the Opening Conference, the inspector is required to deliver a copy of the compliant to the appropriate employer and Construction Manager.

    - The OSH Act entitles the complaint to anonymity is they so desire, which means their name may be deleted from the employer's copy of the complaint. However, it may be important to know whether outside interests are attempting to use the complaint system to dispute the project or harassment.

    - BCCI Construction, LLC should inquire of the inspector of who filed the complaint. Was this complaint filed by one of their employees, sub-contractor employee, or a third party?

- Federal or State: The OSH Act authorizes States to adopt their own OSHA plan and enforcement procedures, which the State of California has accomplished. Generally, there is little to no difference between State & Federal plans affecting rights, responsibilities, and procedures. This information is a combination of both plans as BCCI operates in both jurisdictions.

GOOD FAITH

An employer attitude and cooperation during the inspection/investigation process demonstrates good faith. An important way to ensure Good Faith Recognition, point out to the CO any special efforts to comply with or exceed Federal OSHA or Cal-OSHA Standards.

Inform and present exceptional features of the safety program, safety meetings, employee education, coaching, mentoring, training, safety equipment, internal inspection procedures, etc. Another way to establish Good Faith with the CO is to immediately correct any identified safety hazard(s) or violation(s), which is pointed out by the CO. If feasible, the Superintendent, Director of Safety, or Sub-Contractor representative shall order these corrections at once to demonstrate to the CO the Good Faith prior to their departure of the project.

IMMINENT DANGER

An imminent danger is any condition or practice which could reasonably be expected to cause death or serious physical harm immediately. When the CO discovers an imminent danger, they will inform the employer representative & request all affected employees be removed from the affected area until the dangerous condition or practice eliminated.

The CO has NO authority either to order the shutdown of an operation, or direct employees to leave the area of imminent danger. If abatement is not immediate or is refused, the CO is authorized to issue an Imminent Danger Citation on the spot and post a copy of the citation in the affected area. They will then proceed to obtain an immediate court order restraining the imminent danger.

SAFETY COMPLAINT PROCEDURES

- Federal and California OSHA affords employees the right to notify Federal Department of Labor or State Department of Industrial Relations requesting an inspection of the workplace if they believe an unsafe or unhealthy condition exists. Federal OSHA and Cal-OSHA places a high-priority to employee complaints with a large percentage of inspections are of this type.

- Unsafe acts and conditions may occur on construction projects without the knowledge of supervision. This complaint system is usually an effort to call these conditions to the attention of the Superintendent. As most safety complaints are in Good Faith, they should be welcomed with open arms as an opportunity to correct unknown safety hazards or deficiencies prior to the potential of injury.

- All complaints shall be investigated and resolved prior to the situation being elevated or results in an injury or an official Cal-OSHA or OSHA complaint.

- Follow the below listed procedure when handling employee safety complaints:

    - NEVER ignore or dismiss any complaint from an employee or trade.

    - All complaints must be elevated to the BCCI Director of Safety & Project Superintendent.

- Immediately investigate the complaint and enact Corrective Actions.
- Immediately contact BCCI Director of Safety for assistance and guidance.
- Consult the Federal and State Safety Standards to validate and verify violation or condition exists.
- Corrective Actions shall be performed immediately; to include any violation or condition believed to be hazardous, which NOT covered by a Federal or State Standard.
- Always report the disposition of the complaint(s) back to the complainant.
- Settle the complaint with mutually agreed satisfaction for all concerned.
- Document all details of the complaint, to include Corrective Actions taken and file for future reference and ensure the BCCI Director of Safety has a copy of actions and reports for recordkeeping.

- This procedure no value to handling complaints internally if all personnel are unaware of the availability. Notify all personnel onsite about the availability and ensure the Hazard Reporting QR Code is posted throughout the project.
- Review the procedures with all personnel on the use and when to file the hazard report during the Job Safety Orientation. Reinforce their compliance with this procedure, as any complaint inspection can be for any contractor, trade, or GC assigned to the project.

1.7 PROJECT SITE SPECIFIC HEALTH & SAFETY PLAN (HASP)

The purpose of a Project Site Specific Health & Safety Plan (HASP) is to provide for the systematic identification, evaluation, and prevention or control of general workplace hazards, specific job hazards, and potential hazards which may arise from foreseeable conditions on any project. The HASP defines the respective project and site employee responsibilities, participation in the program, and individual activities required by each. The coordinated, cooperative approach shall minimize labor and monetary losses and help all site employees to comply with all current laws and regulations.

This plan establishes the duties and responsibilities of the field supervisory staff, as well as the basic procedures followed by each site employee. The regulations and objectives are to help assure the health and safety of each site employee, their fellow workers, all persons authorized to be on the job site, and the public. In the preparation of this plan, every effort is made to be complete, yet practical. It is the explicit intention of the project team each program, policy, and procedure described in the HASP be comprehensive and compliant with all applicable current laws to the best of their ability. The project team, sub-contractors, and all site employees shall apply them to the daily work processes on the project.

It is possible a process or requirement on any job site may not be completely addressed, or a new process or requirement may be encountered. In such conditions, it is understood prior to performing the related work activities each new situation shall be addressed by immediately referring to and applying Local, State, or Federal laws governing the situation for site employees. Rights and responsibilities go hand in hand. No project site employee shall ever intentionally expose any worker to an unsafe condition or observe actual or possible exposure without reporting the instance to his or her supervisor as soon as possible. Site employees are expected to develop their own commitment to safety and health protection for themselves and for their fellow workers. Any site employee who does not comply with the project safety policy, or who is persistently negligent in their responsibilities may be subject to disciplinary action, dismissal, or removal from the project to include future projects.

A Project Site Specific Health & Safety Plan (HASP) shall be developed and implemented for:

- Structures Projects
- Tenant Improvement Projects
- Healthcare Projects
- Life Science Projects
- Hospitality Projects
- Service Projects
- When Required by Client / Contract (OCIP)

1.8 PROJECT SITE LOGISTICS PLAN

Activities on construction projects frequently create hazards for the public and strong, positive steps must be taken to control such hazards and to reduce our exposure to liability claims. Therefore, before the start of the project, the BCCI Project Team shall review the work ahead to determine hazards to the public which may arise during the work and identify required controls to protect the public. As work on the project progresses, the Project Team shall continually review the work to identify new hazards which may arise and implement new controls as required. During the life of the project inspect and maintain all items installed for public safety. The Project Team shall enforce all requirements for public protection with subcontractors where their work creates safety hazards for the public.

Protection for the Public shall conform to ALL Local City Codes and Permits to include the following:

FENCES:

- All construction projects shall be perimeter fenced to prevent unauthorized/inadvertent entry by public.
- Where construction material may tend to splash or intrude into public areas, the fence shall be constructed of solid material such as plywood and be free of openings which might permit the passage of the materials.
- Fences shall be free of projections such as protruding nails, etc., upon which the public may become snagged, impaled, or bump into.
- Fences shall be free of projections that may present tripping hazards to the public.
- Areas on the public side of fences shall be kept free of debris and construction materials.
- Bases and support members of fences shall be so constructed as to prevent accidental displacement of the fence by high winds or if struck by construction vehicles.
- Openings in fences for the passage of construction vehicles and employees shall be equipped with gates incorporating the same safety features required for fence construction.
- Equip gates with locking devices keep closed during work hours and locked during non-working hours.
- Where the erection of fences is not immediately feasible due to the nature of the work, or where fences must be temporarily taken down to facilitate the work, alternate protection such as barricades shall be provided.
- Gates should swing inward as to not create a hazard to oncoming pedestrian and vehicular traffic.

CANOPIES:

- Sidewalk canopies or covered walkways erected in public ways shall be constructed IAW local codes and permitted.
- Bases and support members of canopies shall be so constructed as to prevent accidental displacement by high winds or if struck by construction vehicles.
- Consider jersey barriers as a base for overhead canopies adjacent to vehicular traffic.
- Temporary walkways constructed under canopies shall present a smooth and stable walking surface, free of excessive deflection and tripping hazards.
- Canopies and covered walkways shall be lighted in accordance with local codes.
- Always maintain lighting in working order.
- Walkways under canopies shall be kept free of debris, construction materials, projections, and tripping hazards.
- Canopies are not to be used for the storage of construction materials or equipment unless designed, stamped, and approved by a registered engineer.
- Canopies are not used as work platforms unless approved by the Superintendent.
- When used as a work platform, all open sides of the canopy shall be protected with a standard guardrail installed in compliance with OSHA regulations.
- A ladder shall be used to provide access to the platform when required.
- If the installation of a guardrail is not feasible, employees shall use fall protection.
- Fences attached to canopies shall comply with requirements under the section for fences above.
- Where employees entering or leaving buildings or structures under construction are exposed to overhead hazards, access to the building or structure shall be limited to areas provided with overhead protection of planking, 3/4-inch plywood or equivalent. (check local codes).
- Construct canopies with a four-foot parapet.

1.9 EMERGENCY RESPONSE PLAN

An Emergency Response Plan shall be developed and implemented by BCCI Construction, LLC. The BCCI Business Continuity Plan contains a section devoted to the Emergency Response Plan (ERP) and each Health and Safety Plan (HASP) contains ERP information. In addition, the ERP Section of the HASP the Project Superintendent will provide and maintain throughout the life of the project the following Emergency Type Services:

FIRST AID KIT

- The First Aid Kit (FAK) shall be inspected and inventoried on a weekly basis.
- All Trades on the project must evaluate their own FAK to determine the medical products in the FAK are adequate to meet any situation to include incidents involving chemicals or hazardous materials.
- Each FAK shall contain a Bloodborne Pathogen (BBP) Kit which contains the appropriate PPE (e.g., gloves, gowns, face, and eye protection, etc.)

MEDICAL SERVICES:

- Listing of Physical & Medical Clinics: the HASP contains the nearest Urgent Cares and Hospitals associated to the vicinity of the project and shall be posted.
- A listing of the Police Stations, County Sheriff, and Local Fire Stations to include telephone numbers are contained in the HASP and shall be posted.
- First Aid / CPR / AED Training Requirements: All BCCI Project Team Members (e.g., Superintendents, Assistant Superintendents, Project Managers, Assistant Project Managers, Project Engineers, Laborer Foreman, Lead Laborers, and Carpenters) are to be First Aid / CPR / AED Training which is only good for two (2) years and will require re—certification. Consult with the BCCI Director of Safety for this training.

SAFETY DATA SHEETS (SDSs):

- The SDSs are required to be always onsite for any chemical or hazardous material being used during project construction by our trades.
- These must be reviewed and turned into the Director of Safety one week prior to bringing these items on site.
- Section 4 of the SDS provides direction on First Aid Treatment when exposed or due to failure to wear the appropriate PPE.

FIRE & POLICE SERVICES:

- Police and Fire Services are contained in Section 2 of the HASP for all projects in alignment to their geographical location.

- These items are to be posted on the project site to ensure all personnel have access.

FIRE ALARM:

- Federal, Cal-OSHA, and NFPA Standards require a means of alerting workers to evacuate in the event of an emergency (e.g., fire, gas, natural disaster, etc.)

- This could be in the form of an Air Horn, Sirens, Bells, Public Address System, or other forms of a communication system which is capable of being audible to alter personnel throughout the project site when sounded.

- During tenant improvements, consideration must be given to leaving the Fire Alarm System in place, and if this system is in place work with the Building Engineer on processes and procedures when it is required to be disabled due to certain tasks.

1.10 CRISIS RESPONSE PROTOCOL

CRISIS COMMUNICATION:

The intent of communicating during any crisis is to aid BCCI Construction, LLC & Structure Tone Build Group (STOBG) Organizational personnel to respond in a professional, calm, organized, and expeditious manner. A crisis is a serious incident or accident, which focuses on questionable or potentially negative attention on BCCI Construction LLC & STOBG either in the media or before key audiences. The goal is to influence or control the situation and any media coverage by:

- Offering a credible, knowledgeable spokesperson to respond to media inquiries to provide accurate information to avoid conjecture and the dissemination of potentially damaging misinformation to the public.

- Demonstrating the situation is under competent control and thereby reassuring employees, clients, contractors, and the community.

- Communicating what actions / steps are being taken to control the situation and every effort is being made to mitigate the crisis.

FOR BCCI CONSTRUCTION, LLC,

A crisis may include but NOT limited to:

- Fatality

- Accident involving severe or multiple injuries

- Accident involving a fall greater than six (6) feet

- An explosion, significant fire or chemical release, serious burns

- Amputation or Crush Injury

- Physical contact with heavy machinery

- An event which draws significant media attention

- Natural Disasters or Catastrophic Events

- Pandemic

COMPANY COMMUNICATION PRINCIPLES:

In the event of a crisis, BCCI Construction, LLC is committed to the communication of relevant and information on the situation. The Crisis Response Plan provides guidelines to facilitate this process. When executing the recommended guidelines, BCCI Construction encourages all employees involved in the response process to adhere to the following communications principals:

- Anything said by anyone is “on the record” and considered the opinion of the company.
- Avoid saying “no comment.”
- [***BCCI Construction***] is in the process of gathering facts.
- “Please provide your contact information and I will have the appropriate person call you as soon as possible.”
- Anyone in a BCCI Construction, LLC or Structure Tone hardhat may be considered an agent of management.

CRISIS RESPONSE TEAM:

No one person can fully or effectively manages a crisis. Due to the uncertainty surrounding any crisis, and the potential for escalation or complication, every crisis needs control by a team of experts who represent the various disciplines potentially needed to execute proper response strategy.

RESPONSIBILITIES:

The Primary Crisis Response Team must include:

- Senior Vice President Corporate Safety (STOBG)
- Vice President Risk Management (STOBG)
- Vice President Corporate Communications (STOBG)
- General Counsel (STOBG & BCCI Construction, LLC)
- Assigned Outside Counsel
- Business Unit Leader (BCCI Chief Executive Officer)
- Business Unit Director of Safety (BCCI)
- Personnel Most knowledgeable of incident (BCCI Project Mgr, Superintendent, etc.)

NOTE: It is key an essential all Team Members identify and prioritize appropriate personnel who can serve in a back-up capacity.

Additional Team Members:

- Corporate Claims Director / Officer (STOBG & BCCI)
- Chief Operations Officer / President (BCCI)
- Division Vice President (BCCI) [Location Dependent]; SF, SV, LA, OC)

- Senior Vice President Human Resources (STOBG)
- Senior Director of Human Resources (BCCI)
- Senior Director of Field Operations (BCCI) [Location Dependent; SF, SV, LA, OC)
- Senior Director of Marketing (BCCI)
- Senior Director of Information Technology (BCCI)

CRISIS TEAM RESPONSIBILITIES:

- Define the extent of the crisis
- Implement Communication Protocols (BCCI Emergency Response Plan)
- Designate a Spokesperson
- Determine and coordinate an appropriate response strategy
- Provide Guidance to the Corporate Personnel
- Assign Counsel, Investigator, Grief Counselor, & coordinate Public Relations Statements
- Monitor and Report on Response Efforts
- Evaluate effectiveness of the plan and response team once crisis has ended

CRISIS RESPONSE TEAM ADDITIONAL ACTIONS:

- Provide Additional Notifications as required
- Secure and DO NOT MOVE evidence
- Collect information and statements
- Take Photographs and Sketch Scene

CRISIS SPOKESMAN:

Regardless of the type of crisis, the initial spokesperson(s) will be a Corporate Executive (CEO or President) and / or, if designated the Vice President of Corporate Communication. After initiating the crisis response process, the crisis response team members will determine whom the designated spokesperson should be through the duration of the crisis based upon the type of incident and potential mitigating factors involved. If necessary, identify additional back-up spokespersons (or support personnel) from the project-type and/or geographic region in question.

It is not recommended for any legal personnel interact with media during a crisis. This will ensure an appropriate opportunity exists for the spokesperson to be able to provide the requested information, and the title of the spokesperson does not send an unwarranted message about the seriousness of the incident. The spokesperson will coordinate all comments / statements with BCCI Construction, LLC Chief Executive Officer, President, Counsel, & Structure Tone legal counsel prior to interacting with media.

CRISIS RESPONSE TEAM LEADER:

For all crisis incidents, or potential crisis, the CEO or designated representative is the crisis response team leader. At any given time, the potential exists for the Crisis Response Team members to be dispersed to the project or across the state. Given the potential scenario, the Crisis Response Team Leader plays a pivotal role by initiating the crisis response plan. The responsibility holds true for all types of crises from incidents where the media has yet to be alerted or involved, to those where the crisis has yet to fully manifest itself. Specifically, the Crisis Response Team leader is responsible for:

- Establish Contact, Restricted Access, and Control at the Event Scene
- Convening the Crisis Response Team
- Identifying the Spokesperson
- Alert Structure Tone Build Group Executive and Key Personnel
- Providing administrative support to Crisis Response Team

PUBLIC RELATIONS COMPONENT:

- Crisis Response Team Members assess situation based on available information.
- Crisis Response Team Members determine designated Spokesperson.
- Inform and bring in other parties (if necessary).
- Company Communication drafts initial media response statement: provide updates as appropriate while developing internal and external materials.
- Spokesperson ensures coordination of BCCI & STOBG statements with other parties.
- Crisis Response Team Leader informs all Members on the status of the event or crisis.
- Spokesperson or Crisis Response Team Leader provide status to others as appropriate.
- Crisis Response Team Members determine how & if news of the crisis' resolution is communicated to appropriate audiences.
- Crisis Response Team Members determine what post-crisis actions & activities need to be implemented to correct perceptions created by crisis.

- Crisis Response Team Members analyze and evaluate the effectiveness of the Crisis Response system identifying ways in which to improve the process for future incidents.

TELEPHONE INQUIRY RESPONSE:

During a crisis, numerous calls will come into BCCI Construction, LLC. Notify all personnel who may receive calls or inquiries of the situation and advise them how to respond. Receptionist or Administrative personnel should NOT acknowledge a crisis is occurring. Rather, the standard response should be: ***"Our spokesperson is not available right now. May I take your name and number and have someone call you back as soon as information is available."***

If any personnel are pressed for information about a current crisis, an appropriate response would be: ***"I am not able to comment on this issue. I would be happy to take your name and number and have the appropriate person call you back as soon as information is available."***

It is important to handle each inquiry as efficiently as possible and maintain a tacking log of who called or stopped by with what information is being sought. Specifically, document the following information:

- Name & Telephone Number of the Individual & How long will they be at the number
- Nature of their inquiry

Other Questions which you will ask if there are Media Inquiries:

- What Station or Publication do they represent and what is their deadline?

SAMPLE GENERAL STATEMENT:

In all crises, a statement will be prepared for the Spokesperson to use in handling media inquiries. If a response is needed before a formal statement is prepared, the Spokesperson can simply make a general statement to indicate the stage of the process, such as: ***"We are in the process of gathering facts to determine precisely what has occurred. We will provide more information as it becomes available."***

NOTE: Record Names & Phone Number in the event a return call is warranted.

NOTIFICATION OF EMPLOYEE'S NEXT OF KIN

BCCI & STOBG is concerned about the health & welfare of all their employees and Sub-Contractors. Notify BCCI Senior Director of Human Resources of the event. In the event of a serious or fatal incident, the speed with which an employee's family is informed, and the way in which it is done can ease the pain & afford some level of comfort or support when needed most. Please keep in mind others will know how the employee's family is treated in an emergency.

NOTE: NO discussion with media will occur until the employee's next of kin or emergency contact has been notified.

2.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

Personal Protective Equipment (PPE) is a worker's last defense against injury or illness. When Engineering & Administrative controls are exhausted or when work practices may successfully limit exposures, PPE will be determined & issued to BCCI personnel who will receive training on the newly provided or assigned PPE.

Each Trade is responsible for the procurement, issuance, utilization, maintenance, and storage of PPE. The foreman of each trade shall issue the required equipment to their personnel and must enforce PPE Standards while their personnel are assigned to the project. Each trade shall provide for a regular inspection of the PPE to ensure the equipment is in safe working condition, while providing for the care and maintenance of PPE.

BCCI Construction, LLC requires the following mandatory PPE be worn by all personnel to include trades, clients, architects, etc. on any or all BCCI Projects:

HARD HATS:

- Minimum ANSI Standard-Approved will always be worn (Upon Entry to Exit).
- Trades are responsible to provide their personnel with their own PPE.
- Visitors (clients, architects, etc.) will be provided a Hard Hat at the BCCI Project Office.
- BCCI Hard Harts are for BCCI Construction Personnel ONLY.
- Hard Hats shall be inspected and replaced according to manufacturer's instructions.

CLOTHING:

- Long Pants MUST be worn to the ankle, NO Shorts, Dresses, Mini Skirts, Loose Fitting
- Shirts MUST have Sleeves, NO Muscle Shirts or Tank Tops
- A High-Visibility Vest or High-Visibility Shirt (Yellow, Green, Pink, Orange) with Company Logo MUST be worn while working on BCCI Projects
- A High-Visibility Reflective Vest MUST be worn when working around Heavy Equipment, Directing Traffic, or Exposure to Traffic Situations
- All Personnel to include Trades, Clients, Building Engineers, Vendors, Architects, etc. WILL wear High-Visibility Garments while onsite.

WORK BOOTS:

- An Industrial Quality Work Boot will always be worn, NO Sneakers, High Heels, Flats, Slingbacks, Flip Flops.
- All Personnel to include trades MUST arrive with work boots on prior to entry into the site.

- Metatarsal Guards are required over the work boots when performing duties with a jackhammer, chipping, chiseling of concrete or a task which requires this form of PPE.

- Industrial Quality work boot shall provide sturdy ankle protection to personnel while working.

EYE PROTECTION:

- Safety Glasses MUST be ANSI-Approved Z87 and always worn on BCCI Projects.

- Traditional Normal Eyewear are NOT ANSI Rated, and Safety Glasses or Goggles MUST be worn over the regular glasses.

- Task specific (e.g., handling of corrosives, chemicals, dust, etc.) safety glasses, goggles, etc. will be worn for the duration of the task.

- Additional eye protection in the form of Face Shields will be worn during grinding, chipping, jackhammering, chop-saw operations, etc. or when flying particles are present.

- Dark glasses will NOT be worn inside the project sight as this diminishes what personnel can see.

HAND PROTECTION:

- Kevlar or equivalent arm gauntlets shall be worn during demolition and when working above ceilings.

- When gloves are required, workers have them readily available or on their person.

- Appropriate cut-level gloves are required when performing a specified task for cutting.

HEARING PROTECTION:

- When noise exceeds 85 decibels, a Hearing conservation Program is required.

- A Noise Management Plan is developed to reduce exposures which include substitution, time, distance, shielding, and PPE will be implemented when measures are above the threshold.

- Trades are required to provide their own employees with training and hearing protection when the noise exceeds the OSHA Action Levels.

RESPIRATORY PROTECTION:

NOTE: Refer to Section 14.0 of this Manual for Guidance on Respiratory Protection

TEMPERATURE EXTREMES (HEAT & COLD STRESS):

High temperature and humidity stress the body's ability to cool itself, and heat illness becomes a special concern during hot weather. Although these conditions are most prevalent in the summer, working in any hot environment, including an unventilated room, can present heat-related hazards.

Exposure to freezing and cold temperatures for extended periods of time may cause serious health problems such as trench foot, frostbite, and hypothermia. In extreme cases, including cold water submersion, exposure can lead to death. Employees working outside in the winter months and those working in walk-in freezers are especially vulnerable.

BCCI Safety can perform a hazard evaluation of temperature extreme environments, make recommendations for engineering and administrative controls, provide training, and assist in creating a written program and site-specific Standard Operating Procedures (SOP) to protect employees against the temperature extremes.

HEAT STRESS SYMPTOMS:
Heat rash itchy red skin, heat cramps, painful muscle cramps, heat exhaustion, high body temperature, weakness or feeling faint, headache, confusion or irrational behavior, nausea, or vomiting, heat stroke, no sweating (hot dry skin), confusion, or convulsions. Seek immediate medical attention.

PRECAUTIONS FOR HUMID CONDITIONS:
Increase the frequency and length of employees rest breaks (work-rest cycles), provide cool drinking water near the workers, and remind them to drink a quart of water for the duration of their shift. When workers are working in direct sunlight, require them to use the buddy system.

COLD STRESS:
This is when cold blood vessels construct decreasing the blood flow to your extremities. This assist your critical organs stay warm, but your extremities are at risk of frostbite.

FROSTBITE:
This is when the flesh freezes blood vessels which are damaged and reduce blood flow can lead to gangrene. The first sign of frostbite is when the skin looks waxy and feels numb.

WIND CHILL:
This factor accelerates heat loss and does to a dramatic extent. (e.g., if the air is -30°C, with NO wind, there is little danger of the skin freezing; however, with 10 m/h wind the skin can freeze in a minute, and with 20 m/h wind, the skin can freeze in 30 seconds.

PRECAUTION TO COLD STRESS:
Wear several layers of clothing, wear gloves, drink warm high calorie drinks and food, personnel shall take warm-up and rest breaks (work-rest cycles) in a heated shelter. Encourage hydration and stop work if improperly clothed.

TRAINING:

Each employee will receive training by BCCI Construction, LLC in the following:

1. When and what Personal Protective Equipment (PPE) is required
2. How to properly don, doff, adjust, and wear of PPE
3. What the limitations are of the PPE
4. Proper care, maintenance, life expectancy, and disposal of PPE
5. Re-training will be conducted if the employee:
    a. Does not Understand
    b. Change in Job Requirements
    c. Failure to properly wear and use PPE

3.0 BCCI COVID-19 WRITTEN PROGRM (Cal-OSHA REQUIREMENT)

Model COVID-19 Prevention Program (CPP)

COVID-19 is considered a workplace hazard and most employers must address COVID-10 prevention under their Injury Illness Prevention Program (IIPP) or independent document. COVID-19 referenced Sections of *CCR Title 8 Section §3205 through 3205.3* apply until two (2) years after February 3, 2023, except for the Recordkeeping *Sub-Sections §3205 (j) (2) through (3)*, which apply to this program for three (3) years after February 3, 2023.

- All elements which may be required in the following CCR, Title 8 Section:
    - § 3205, COVID-19 Prevention
    - § 3205.1, COVID-19 Outbreaks
    - § 3205.2, COVID-19 Prevention in Employer-Provided Housing
    - § 3205.3, COVID-19 Prevention in Employer-Provided Transportation
    - There are three (3) additional considerations provided at the end of this section to validate and verify applicability in the workplace.
- Additional Guidance and Resources are available at www.dir.ca.gov/dosh/coronavirus/

AUTHORITY AND RESPONSIBILITY

The Safety Division (Matty Kernen-Director of Safety and Tony Fisher-Safety Coordinator) has the overall authority and responsibility for the implementation and provisions of this COVID Prevention Program (CPP) in our workplace. In addition, all personnel of BCCI Construction, LLC are responsible for the implementation and maintenance of the CPP in their assigned work areas and project sites, while ensuring personnel receive communication in a language they understand.

All personnel are responsible for following and using safe work practices, following all directives, policies, procedures, and assisting in maintaining a safe work environment.

The following is an Application of the BCCI Construction, LLC Injury & Illness Prevention Program (IIPP) as COVID-19 is a recognized hazard within the workplace and addressed through this section of our Code of Safe Work Practices and will be effectively, efficiently implemented, maintained, and sustained to ensure:

- When determining measure to prevent COVID-19 transmission and identifying and correcting these hazards in the workplace.
- All personnel within our workplace are treated as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 results.
- COVID-19 is treated as an airborne infectious disease. All applicable Federal, State, County, and Local Health Department orders and guidance will be reviewed when

determining measure to prevent transmission, identifying, and correcting COVID-19 hazards. These controls consist of and include:

- Remote Work, Physical Distancing, Reducing Population Density Indoors.
- Moving Indoor Tasks Outdoors, Implementing Separate Shifts / Breaks.
- Restricting access to work areas, Facial Covering, Daily Sign-In, Cleaning.

- Training and instruction on COVID-19 prevention is provided:
  - Initially when COVID-19 began and the creation of this written program.
  - To all New Hire Personnel during New Hire Orientation (NHO).
  - To personnel when a new project assignment on the hazards of COVID-19 or if they have not been previously trained.
  - Whenever New (N) COVID-19 Hazards are introduced or identified.
  - For Supervision to familiarize with the hazards of COVID-19 which personnel under their immediate supervision and control may be exposed.
  - All training will be documented and available upon request.

- Procedure for the investigation of COVID-19 illnesses at the workplace or project site:
  - Determine the day and time a COVID-19 event was last present onsite, the date of the Positive COVID-19 tests or diagnosis, the date of one or more symptoms (Reference Appendix B of this section).
  - Determine the extent of exposure to other personnel, provide notification via a BLIND (bottom line, intent, next, and discussion) to Senior Leaders, Legal, Human Resources, Studio Directors, etc.

- Procedures for responding to COVID-19 events in the workplace or project site will:
  - Exclude all COVID-19 cases to include personnel under *CCR, Title 8, Section §3205.1* under the following requirements.
  - Any CoVID-19 cases which do not develop symptoms will NOT return to work during the infectious period.
  - Any COVID-19 cases which develop symptoms will NOT return to work during the shorter of either:
    - Infectious Period

- Through 10-days after the onset of symptoms and at least 24-hours have passed since a fever of 100.4° F or higher has resolved without us of fever reducing medications.

- Regardless of vaccination status, previous of infection, or lack of COVID-19 symptoms, a COVID-19 case MUST wear a facial covering in the workplace until the 10 days have passed since the date of symptoms began or, if the did NOT have symptoms, from the date of first Positive test.

- Review applicable orders and industry-specific guidance from the State of California Department of Public Health, California OSHA, County, and Local Health Authorities regarding guidance relevant to isolation, quarantine, and measures to reduce transmission.

- If an order to isolate, quarantine, or exclude personnel is issued by a Federal, State, County, or Local Health Official, personnel will NOT return to work until the period of isolation or quarantine is completed or lifted.

- If the removal of personnel would create an undue risk to a community's health, BCCI Construction, LLC, may submit a request for a waiver to Cal-OSHA in writing to rs@dir.ca.gov to allow personnel to return to work if it does not violate State, County or Local Health Official Orders for isolation, quarantine, or exclusion.

    - Personnel will be required to wear facial coverings, maintain social distancing and work in an isolated area of the project or office

    - Areas will be disinfected and cleaned after each use to include restrooms, break areas, and isolated work area by a competent person wearing all required PPE (gloves, gowns, facial covering, eye protection, etc.).

- Upon the exclusion of personnel from the workplace based on COVID-19 or close contact, BCCI Construction, LLC Human Resources will provide excluded personnel with information regarding COVID-19 related benefits for which personnel may be entitled under all applicable Federal, State, County, and Local Laws.

- This includes any benefits available legally mandated sick leave, workers' compensation law, local governmental requirements, and BCCI Construction, LLC leave policies and leave guaranteed by contract. Human Resources will discuss with personnel and provide all information via e-Mail, USPS Mail, and over Microsoft Teams.

TESTING of CLOSE CONTACTS

COVID-19 tests are available at NO-COST, during paid time, to all BCCI personnel who had a Close Contact within the workplace or project site. Personnel will be provided with the information detailed above with respect to benefits, leave, and other benefits entitled during COVID-19 illness.

Exceptions are returned cases as defined in *CCR, Title 8, Section §3205 (b) (11).*

NOTICE OF COVID-19 CASES

Personnel and Trade Company working with BCCI Construction, LLC on project site or personnel within the workplace who have had a Close Contact, as well as any employer with personnel who had a Close Contact, will be notified immediately, usually within 24-hours.

Labor Code, Section §6409.6, or any successor law is in effect, BCCI Construction, LLC will:

- Provide notice of a COVID-19 case, in a form readily understandable to personnel. This notice will be given to all personnel, employers, and trade partners at the project site.
- Provide the notice of exposure to the authorized representative, if any:
    - The COVID-19 case and of any personnel who had Close Contact.
    - All personnel onsite or in the office during the infectious period of active case.

FACIAL COVERINGS:

Personnel will be provided facial coverings and required to wear them when required by a CDPH order. This includes spaces within vehicles when a CDPH order requires facial coverings indoors. Facial coverings will be clean, undamaged, and worn over the nose and mouth.

The following exceptions apply:

- When an employee is alone in a room or vehicle.
- While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.
- While employees are wearing respirators required by the employer and used in compliance with *CCR, Title 8, Section §5144*.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing- impaired person. Such employees shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
- During specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time-period in which such tasks are being performed.

If an employee is not wearing a facial covering due to the exceptions above, the COVID-19 hazards will be assessed, and further action taken as necessary. Personnel will not be prevented from wearing a facial covering, including a respirator, when not required by this section, unless it creates a safety hazard.

RESPIRATORS

Respirators will be provided for voluntary use to personnel who request them and who are working indoors or in vehicles with more than one person. Personnel who request respirators for voluntary use will be:

- Encouraged to use them.
- Provided with a respirator of the correct size.
- Trained on:
    - How to properly wear the respirator provided.
    - How to perform a user seal check according to the manufacturer's instructions each time a respirator is worn.
    - Inform facial hair interferes with a seal.

The requirements of *CCR, Title 8, Section §5144 (c) (2)* will be complied with according to the type of respirator (disposable filtering face piece or elastomeric re-usable) provided to employees.

An evaluation of PPE was performed, and it was determined; gloves, goggles, safety glasses, facial coverings, N95, KN95 as required items to be worn, and will provide upon request, and ensure use of these items in both office and project sites.

Upon request, BCCI Construction, LLC will provide N95 or KN95 respirators for a voluntary use to all employees who are working indoors or in vehicles with more than one person who is not family related.

Voluntary users will be provided with information contained in *CCR, Title 8, Section, §5144 (c) (2) Appendix D* of the Standard, describing voluntary use conditions listed below:

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of a hazardous substance does NOT exceed the limits set by OSHA Standards. If your employers provide respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to ensure the respirator itself does NOT present a hazard.

PERSONNEL SHOULD DO THE FOLLOWING:

- *Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning, care, and warnings regarding the respirator's limitations.*
- *Choose the respirator certified for use to protect against the contaminant of concern. The National Institute for Occupational Safety and Health (NIOSH) of the U.S. Department of*

Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. This will tell you what the respirator is designed for and how it will protect you.

- *Do Not wear your respirator into atmospheres containing contaminants for which your respirator is NOT designated to protect you against. (e.g., a respirator designed to filter dust particles will NOT protect you against gases, vapors, or very small solid particles of fumes or smoke.*

- *Keep track of your respirator so you do NOT mistakenly use anyone's respirator other than your own*.

We ensure, promote, encourage the use of respirators in compliance with *CCR, Title 8, Section §5144* when deemed necessary by California OSHA. We also provide and ensure the use of Eye and Respiratory Protection when personnel are exposed to procedures which may aerosolize potentially Infectious Materials (e.g., saliva or respiratory tract fluids).

VENTILATION

For our indoor workplaces we will:

- Review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments. BCCI Construction, LLC will develop, implement, and maintain effective methods to prevent transmission of COVID-19, including one or more of the following actions to improve ventilation:

    - Maximize the supply of outside air to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

    - In buildings and structures with mechanical ventilation, filter circulated air through filters at least as protective as Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.

    - Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

- Determine if our workplace is subject to *CCR, Title 8, Section §5142* Mechanically Driven Heating, Ventilating and Air Conditioning (HVAC) Systems to Provide Minimum Building Ventilation, or *Section §5143* General Requirements of Mechanical Ventilation Systems, and comply as required.

In vehicles, we will maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

REPORTING, RECORDKEEPING, AND ACCESS

BCCI CONSTRUCTION, LLC IS REQUIRED TO:

Report information about COVID-19 events and outbreaks which occur at our workplace to the Local Health Department, whenever required by local law and reporting criteria and provide any related information requested.

Maintain records of the process and steps taken to implement our written COVID-19 Written Prevention Program in accordance with CCR Title 8, § 3203 (b).

Ensure our COVID-19 Written Prevention Program is readily available at the workplace and accessible for personnel, authorized representatives, and any Compliance Office from Cal-OSHA upon request.

Maintain record and track all COVID-19 events; through the investigation of COVID-19 events.

APPENDIX A: COVID-19 TRAINING ROSTER

DATE:	**09 FEBRUARY 2023**
INSTRUCTOR:	**MATTY KERNEN – DIRECTOR of SAFETY**
LOCATION:	**SF OFFICE 1160 BATTERY STREET, SUITE 250, SAN FRANCISCO, SAN FRANCISCO COUNTY, CA**
TOPIC:	**OSHA 30 DAY 3**

	NAME	SIGNATURE	DEPARTMENT
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APPENDIX B: INVESTIGATING COVID-19 EVENTS

All personal identifiable information (PII) of COVID-19 events or personnel with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information of COVID-19 Events will be provided to the local health department, CDPH, Cal-OSHA, the National Institute of Occupational Safety & Health (NIOSH) immediately upon request, and when required by law.

Date:		
Name of Person Conducting Investigation:		
Name of C19 Case:		Phone:
Occupation:		
Names of Persons Involved:		
1.		
2.		
Date Last was Onsite:		
Address of Event:		
Company:		
Areas Worked and Traveled:		
Date of Test:	Type of Test: ☐ Home ☐ PCR ☐ Rapid	Result: ☐ Negative ☐ Positive
Date of Test:	Type of Test: ☐ Home ☐ PCR ☐ RAPID	Result: ☐ Negative ☐ Positive
List of Personnel in Contact With:		
Close Contact (Less than 6 feet, Longer than 15 Minutes? ☐ Yes ☐ No		
Vaccinated: ☐ Yes ☐ No ☐ Decline to Answer		
Date of Last Vaccination		Dose:
Brand: ☐ Pfizer ☐ Moderna ☐ Johnson & Johnson		

CLOSE CONTACTS AT WORK LOCATION:

Name	Vax Status	Phone or e-Mail	Date Exposed	Notified

What was the work environment conditions which could have contributed to the risk of exposure to COVID-19?

What can or could be accomplished to reduce the potential exposure of COVID-19?

OTHER NOTIFICATIONS:

Contact (Name)	Date Notified
Work Location:	
Local Dept of Public Health:	
State Dept of Public Health:	
Local Union:	

ADDITIONAL CONSIDERATION 1: COVID-19 OUTBREAKS

NOTE: This addendum is in effect until there are no new COVID19 events detected within an exposed group who visited the work environment during their high-risk period at any time during a 14-day period. CCR, Title 8, §3205.1 for details.

COVID-19 TESTING:

BCCI Construction will ensure COVID-19 testing is available to all personnel at no cost, during paid time, in the exposed group, except:

- Personnel who were not present during the relevant 10-day period.
- Personnel who were fully vaccinated prior to the multiple infections or outbreak & who do not exhibit any symptoms
- C19 events who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms or, for C19 events who never developed symptoms, 90 days after the 1st Positive Test.

C19 TESTING CONSISTS OF THE FOLLOWING:

- All personnel in our exposed group are immediately tested and isolated; then tested one week later.
- Negative C19 Test results of personnel with C19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or health orders issued by local health departments.
- After two C19 tests, we continue to provide C19 testing once a week of personnel in the exposed group who remain onsite, or more frequently if recommended by local health authorities.
- Additional testing is performed when deemed necessary by Cal- OSHA.

We continue to comply with all applicable elements of our CPP & the following:

- Personnel in the exposed group wear facial coverings when indoors and less than 6 feet apart.
- We give notice to personnel in the exposed group of their right to request a respirator for voluntary use.
- We evaluate whether to implement social distancing of at least six feet between personnel, or where six feet of social distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce C19 transmissions.

COVID19 INVESTIGATION, REVIEW, AND HAZARD CORRECTION:

A review is performed of potentially relevant COIVD-19 policies, procedures, and controls; then implement changes as needed to prevent the further spread of COVID-19.

THE INVESTIGATION AND REVIEW ARE DOCUMENTED AND INCLUDES:

INVESTIGATION OF NEW OR UNABATED COVID-19 HAZARDS INCLUDING:

- Our leave policies & practices (Personnel encouraged to remain home)
- COVID-19 testing policies
- Insufficient Outdoor Air and Air Filtrations
- Lack of Physical Social Distancing

UPDATING THE REVIEW:

- Every thirty (30) days the outbreak continues
- Response to new Information or New or Previously unrecognized C19 hazards
- When otherwise necessary

IMPLEMENTING CHANGES TO REDUCE TRANSMISSION OF C19 BASED ON THE ABOVE INVESTIGATION AND REVIEW. CONSIDERATION:

- Moving Indoor tasks outdoors if applicable
- Increasing outdoor air supply when tasks are performed indoors a& improv Air Filtration
- Increasing Social Distancing as much as possible and feasible
- Requiring Respiratory Protection in compliance with CCR, Title 8, §5144 or Facial Coverings

BUILDINGS OR STRUCTURES WITH MECHANICAL VENTILATION:

The filtration of recirculated air will be accomplished with a HEPA or MERV13 filters, if compatible with the ventilation system. If HEPA or MERV13 are not compatible, the use of filters with the highest compatible filtering efficiency. An evaluation will be conducted to ascertain if portable HEPA filtration system or other air cleaning systems can be used to reduce the risk of transmission and if so, implemented to utmost full impaction possible.

MAJOR OUTBREAKS:

The following will be done while *CCR, Title 8, Section §3205.1* applies if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period:

- The COVID-19 testing will be required of all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by Local authorities or Company Policy. Personnel in the exposed group will be tested or excluded and follow our CPP return to work requirements. The twice a week testing requirement ends when there are fewer than three new COVID-19 cases in the exposed group for a 14-day period. We will then follow weekly testing requirement until there are one or fewer new COVID-19 cases in the exposed group for a 14-day period.

- Report the outbreak to Cal/OSHA.

- Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees according to *CCR, Title 8, Section §5144 (c) (2)* requirements.

- Any employees in the exposed group who are not wearing respirators as required will be separated from other persons by at least six feet, except where it can be demonstrated that at least six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include:

    - Telework or other remote work arrangements.

    - Reducing the number of persons in an area at one time, including visitors.

    - Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel

    - Staggered arrival, departure, work, and break times.

    - Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.

ADDITIONAL CONSIDERATION 2 – COVID-19 PREVENTION EMPLOYER-PROVIDED TRANSPORTATION:

THIS ADDENDUM DOES NOT APPLY:

- If the driver and all passengers are from the same household outside of work, such as family members, or if the driver is alone in the vehicle.
- To employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations.
- To employees with occupational exposure as defined by section §5199.
- To vehicles in which all employees are fully vaccinated.
- To public transportation.

ASSIGNMENT OF TRANSPORTATION

To the extent feasible, we reduce exposure to COVID-19 hazards by assigning employees sharing vehicles to distinct groups and ensuring that each group remains separate from other such groups during transportation, and during work activities. We prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit are transported in the same vehicle.
- Employees working in the same crew or workplace are transported in the same vehicle.
- Employees who DO NOT share the same household, work crew, or workplace and are transported in the same vehicle only when NO other transportation alternatives are feasible.

FACE COVERINGS AND RESPIRATORS

- Facial covering requirements of our CPP are followed for employees waiting for transportation, if applicable.
- All employees are provided with facial coverings, which must be worn unless an exception under our CPP applies.
- Upon request, we provide respirators for voluntary use in compliance with subsection §5144(c)(2) to all employees in the vehicle.

SCREENING:

We develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

VENTILATION:

We ensure the vehicle windows are kept open, and the ventilation system is set to maximize outdoor air and not set to recirculate air. Windows DO NOT have to be kept open if none or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and excessive outdoor heat would create a hazard to employees.
- The vehicle has functioning heating in use and excessive outdoor cold would create a hazard to employees.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

HAND HYGIENE:

We provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.

4.0 WORKPLACE VIOLENCE PROGRAM (Cal-OSHA REQUIREMENT)

POLICY STATEMENT:

Our establishment, BCCI Construction, LLC is committed to our personnel safety and health. We refuse to tolerate any form of violence in the workplace and will make every effort to prevent violent incidents from occurring by implementing a Workplace Violence Prevention Program (WVPP). We will provide adequate authority and budgetary resources to responsible parties so our goals and responsibilities can be met.

All company personnel are responsible for implementing and maintaining our WVPP Program. We encourage employee participation in designing and implementing our program. We require prompt and accurate reporting of all violent incidents whether physical injury has occurred. We will not discriminate against victims of workplace violence.

A copy of this WVPP Plan is readily available to all employees and can be requested from Human Resources, Managers, and Supervisors.

Our plan ensures all personnel, adhere to work practices which are designed to make the workplace secure, and DO NOT engage in verbal threats or physical actions which create a security hazard for others in the workplace.

All personnel are responsible and accountable for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe, healthful, and secure work environment.

The management of our establishment is responsible for ensuring all safety and health policies and procedures involving workplace security are clearly communicated and understood by all everyone. Senior Leaders, Human Resources, Safety, Managers, and Supervisors are expected to enforce the rules fairly and uniformly.

The WVPP Plan will be reviewed and updated annually in conjunction with Code of Safe Work Practices.

RESPONSIBILITY AND ACCOUNTABILITY:

The Workplace Violence Prevention Program Administrator is Norma Adjmi, Senior Director of Human Resources and Matty Kernen, Director of Safety have the authority and responsibility for implementing the provisions of this program for BCCI Construction, LLC. All personnel are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the program.

In addition, a WVPP Planning Group will be established to assess the vulnerability to workplace violence at our establishment and reach agreement on preventive actions to be taken. This group will be responsible for developing employee training programs in violence prevention and plans for responding to acts of violence. They will also audit our overall Workplace Violence Prevention Program.

The Workplace Violence Prevention Group will consist of:

Name: Norma Adjmi
Title: Senior Director of Human Resources
Phone: (415) 817-5100

Name: Jose Cruz
Title: Human Resources Manager
Phone: (415) 817-5100

Name: Matty Kernen
Title: Director of Safety
Phone: (415) 264-3840

Name: Eric Bauer
Title: Senior Director Field Operations San Francisco
Phone: (415) 850-0052

Name: Sean Hansen
Title: Senior Director Field Operations Silicon Valley
Phone: (415) 517-9015

Name: Nicholas Brown
Title: Director Field Operations Southern California
Phone: (213) 334-5400

Name: Dominic Sarica
Title: President – Chief Operations Officer
Phone: (415) 420-9393

Name: Robert Edington
Title: Chief Legal Officer
Phone: (415) 225-2429

COMPLIANCE:

All employees are responsible and will be held accountable for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe and secure work environment.

All personnel will comply with work practices which are designed to make the workplace more secure and will not engage in threats or physical actions which create a security hazard for others in the workplace.

Managers and supervisors will:

- Inform all personnel about our Workplace Violence Prevention Program (WVPP).
- Evaluate the performance of all employees in complying with our establishments workplace security measures.

- Recognize employees who perform work practices which promote security in the workplace.

- Provide training and / or counseling to personnel who need to improve work practices designed to ensure workplace security.

- Discipline employees for failure to comply with workplace security practices.

- Follow established workplace security directives, policies, and procedures.

Personnel will maintain an open, two-way communication system on all workplace safety, health, and security issues. Our establishment has a communication system designed to encourage a continuous flow of safety, health, and security information between management and our employees without fear of reprisal and in a form which is readily understandable.

Our communication system consists of the following items:

- New employee orientation on our establishments workplace security policies, procedures, and work practices is conducted by our Human Resources Department.

- Periodic review of our Workplace Violence Prevention Program (WVPP) with all personnel.

- Training programs designed to address specific aspects of workplace security unique to our establishment.

- Regularly scheduled safety meetings with all personnel which include workplace security discussions.

- A system to ensure all personnel understand the workplace security policies.

- Posted or distributed workplace security information.

- A system for personnel to inform management about workplace security hazards or threats of violence.

- Procedures for protecting employees who report threats from retaliation by the person making the threats.

- Our establishment communicates with and instructs employees orally about general safe work practices with respect to workplace security.

HAZARD ASSESSMENT:

The Workplace Violence Prevention Group will perform workplace hazard assessment for workplace security in the form of record keeping and review, periodic workplace security inspections, and a workplace survey. The assessment group will identify workplace violence and security issues and make recommendations to management and employees.

RECORD KEEPING AND REVIEW:

NOTE: Care must be taken to ensure appropriate confidentiality of medical and personnel records, as required by the ADA (Americans with Disabilities Act) and other applicable regulations or policies.

Periodic updates & review of the following Workplace Violence Reports & Records will be made:

- Occupational Safety and Health Administration (OSHA) 300 Logs
- Workplace Violence Incident Reports
- Information compiled for recording assault incidents or near-assault incidents (e.g., Threat & Assault Log)
- Insurance Records & Police Reports
- Workplace survey & Accident Investigations
- Training Records
- Grievances
- Inspection Information
- Any other relevant records or information

WORKPLACE SECURITY INSPECTIONS:

Periodic inspection to identify and evaluate workplace security hazards and threats of workplace violence will be performed by the following observer(s) in the following areas of our workforce:

OBSERVER	**AREA OF PROJECT**

Periodic inspections are performed according to the following schedule:

- _____ (Frequency: Weekly, Monthly, etc.)
- When we initially established our Workplace Violence Prevention Program (WVPP)
- When new, previously unidentified security hazards are recognized
- When occupational injuries or threats of injury occur
- Whenever workplace security conditions warrant an inspection

Periodic inspections for security hazards consist of the identification and evaluation of workplace security hazards and changes in employee work practices, which may require assessing for more than one type of workplace violence. Our establishment performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace security hazards.

Inspections for workplace security hazards from violence by strangers (Type 1) include assessing:

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for security surveillance measures, such as mirrors or cameras.
- Posting of signs notifying the public that limited cash is kept on the premises.
- Procedures for employee response during a robbery or other criminal act.
- Procedures for reporting suspicious persons or activities.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services where employees have access to a telephone with an outside line.
- Limiting the amount of cash on hand and using time access safes for large bills.
- Staffing levels during evening hours of operation and at other high-risk times.
- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking employees to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or areas.

Inspections for workplace security hazards from violence by strangers (Type 2) include assessing:

- Access to and freedom of movement within, the workplace.
- Adequacy of workplace security systems, such as door locks, security windows, physical barriers, and restraint systems.
- Frequency and severity of threatening or hostile situations which may lead to violent acts by persons who are service recipients of our establishment.
- Employees skill in safely handling threatening or hostile service recipients.
- Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.
- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking employees to their cars or mass transit stops at the end of the workday).

- Adequacy of lighting and security for designated parking lots or areas.
- The availability of employee escape routes.

Inspections for workplace security hazards from violence by strangers (Type 3) include assessing:

- How well our establishments anti-violence policy has been communicated to personnel.
- How well our establishments management & employees communicate with each other.
- How well our personnel know the warning signs of potential workplace violence.
- Access to and freedom of movement within, the workplace by non-employees, specifically recently discharged employees.
- Frequency and severity of employee-reported threats of physical or verbal abuse by personnel.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
- Employee disciplinary and discharge procedures.

Inspection for workplace security hazards from violence by personal relations include assessing:

- Access to, and freedom of movement within, the workplace by non-employees, specifically personal relations with whom one of our employees are having a dispute.
- Frequency and severity of employee-reported threats of physical or verbal abuse which may lead to violent acts by a personal relation.
- Adequacy of workplace security systems, such as door locks, security windows, and physical barriers.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs.
- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking employees to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or areas.
- Warnings or police involvement to remove personal relations of employees from the worksite and effectiveness of restraining orders.

WORKPLACE SURVEY:

Under the direction of the Workplace Violence Prevention Administrator & Group, we distributed a survey among all personnel to identify any additional issues which were not noted in the records review or the security inspection.

FINAL RECOMMENDATIONS:

Based on the records review, workplace security inspection and survey, the Workplace Violence Prevention Group has identified the following issues which need to be addressed:

In Order to reduce the risk of workplace violence, the following measures have been recommended:

ENGINEERING CONTROLS AND BUIDING or WORK AREA DESIGN:

WORKPLACE PRACTICES:

Senior Leaders has instituted the following because of the workplace violence hazard assessment and the recommendations made by the Workplace Violence Prevention Group

These changes were completed on _____ Date.

Police and Procedures developed because of the Workplace Violence Prevention Group recommendations:

TRAINING and INSTRUCTION:

We have established the following policy on training of all personnel with respect to workplace violence and security.

All personnel shall have training and instruction on general and job-specific workplace security practices. Training and instruction shall be provided when the Workplace Violence Prevention Program (WVPP) is first established and periodically thereafter. Training shall be provided to all new employees and to other employees for whom training has not previously been provided. It shall also be provided to all personnel given new job duties for which specific workplace security training for the job duties has not previously been provided. Additional training and instruction will be provided to all personnel whenever the employer is made aware of new or previously unrecognized security hazards.

General workplace violence and security training and instruction includes, but is not limited to, the following:

- Explanation of the WVPP including measures for reporting any violent acts or threats of violence.
- Recognition of workplace security hazards including the risk factors associated with the four types of violence.
- Measures to prevent workplace violence (Criminal Intent, Customer/Client, Worker on Worker, and Personal Relationships) including procedures for reporting workplace security hazards or threats to managers and supervisors.
- Ways to defuse hostile or threatening situations.
- Measures to summon others for assistance.
- Employee routes of escape.
- Notification of law enforcement authorities when a criminal act may have occurred.
- Emergency medical care provided in the event of any violent act upon an employee.

- Post-event trauma counseling for those employees desiring such assistance.

In addition, we provide specific instructions to all personnel regarding workplace security hazards unique to their job duties, to the extent where such information was not already covered in other training.

We have chosen the following items for training and instruction for all personnel:

- Crime awareness.
- Location and operation of alarm systems, panic buttons and other protective devices.
- Communication procedures.
- Proper work practices for specific workplace activities, occupations, or duties, such as late-night work, public transportation, demolition, etc.
- Self-protection.
- Dealing with angry, hostile, or threatening individuals.
- Using the "buddy" system or other assistance from co-employees.
- Awareness of indicators that lead to violent acts by service recipients.
- Employee assistance programs.
- Review of anti-violence policy and procedures.
- Managing with respect and consideration for employee well-being.
- Pre-employment screening practices.
- Role playing a violent incident.

INCIDENT INVESTIGATION:

Our procedures for investigating incident or workplace violence threats and physical injury include:

- Reviewing all previous incidents
- Visiting the scene of an incident as soon as possible
- Interviewing threatened or injured personnel and witnesses
- Examining the workplace for security risk factors associated with the incident, including any previous report of inappropriate behavior by the perpetrator.

- Taking corrective action to prevent the incident from recurring.
- Recording the findings and corrective action taken
- Inform the Workplace Violence Prevention Group of findings and recommendations.

WORKPLACE VIOLENCE INCIDENT REPORT FORM

Parts 1 though 7 shall be completed by the Designated Person based on the information provided by the Employee(s) involved in the incident.

PART 1 – NATURE of the INCIDENT: (check all which apply)

☐ ***Threat*** ☐ ***Verbal*** ☐ ***Written*** ☐ ***Electronic***
☐ ***Physical Injury*** ☐ ***Physical w/out Injury*** ☐ ***Harassment***
☐ ***Behavioral Observation*** ☐ ***Information Only***
☐ ***Other:***

Date of Incident:	**Time of Incident:**	☐ **AM** ☐ **PM**

Description of Observation, Threat, Incident, Injury, or Activity. Use Additional Paper if Necessary.

PART 2 – INCIDENT DIRECTED AT:

Person(s):
Project: Project Address:
City:

PART 3 – INCIDENT INITIATED BY:

Person(s):
☐ Male ☐ Female ☐ Employee DUTY TITLE:
Project: Project Address:

PART 4 – TYPE / LOCATION INCIDENT OCURRED:

Type of Contact:
☐ In-Person ☐ Telephone ☐ Mail ☐ Observation
☐ Recording ☐ e-Mail ☐ Fax ☐ Other

Was the Employee Alone? ☐ YES ☐ NO

Location of Incident:
Where on Project Site did this Event Occur?
Project Address and Floor:

PART 4 – CONTINUED:

Type of Incident: ☐ ***Type 1*** ☐ ***Type 2*** ☐ ***Type 3***

Were Any Threats Made Prior to the Actual Incident? ☐ ***YES*** ☐ ***NO*** ☐ ***Unknown***

Did the Employee(s) Report They Were Threatened, Harassed, or Suspicious the Person Would Become Violent? ☐ ***YES*** ☐ ***NO*** ☐***UNKNOWN***

Was the Perpetrator a Stranger, Client, Co-Worker, or a Familiar Person? ☐ ***YES*** ☐ ***NO***

Was There a Weapon Involved in the Incident? ☐ ***YES*** ☐ ***NO***
If Yes, Please Describe What Type of Weapons:

Were there any Injuries? ☐ ***YES*** ☐ ***NO***
If Yes, who was Injured:

Name: ***Phone:***
Injuries Sustained:

Name: ***Phone:***
Injuries Sustained:

Name: ***Phone:***
Injuries Sustained:

Name: ***Phone:***
Injuries Sustained:

Were There Any Witnesses? ☐ ***YES*** ☐ ***NO***
If Yes, who are the Witnesses:

Name: ***Phone:***
Duty Title: ***Company:***

Name: ***Phone:***
Duty Title: ***Company:***

Name: ***Phone:***
Duty Title: ***Company:***

Name: ***Phone:***
Duty Title: ***Company:***

PART 5 – ACTION TAKEN by SUPERVISOR:

Local Law Enforcement or Other Agency Contacted? ☐ ***YES*** ☐ ***NO***
Agency Name:
Case Number:

PART 6 – ADMINISTATIVE ACTION TAKEN:

PART 7 – ACKNOWLEDGEMENT STATEMENT:

By signing below, I swear the statements made herein are true and correct to the best of my knowledge. I understand any false statements may have a negative effect on my employment with BCCI Construction, LLC including up to termination.

Employee Reporting Name:

Employee Reporting Signature:

Date:

Supervisor / Manager / Director Name:

Supervisor / Manager / Director Signature:

Date:

WITNESS STATEMENT

Witness Name:	Date of Injury / Incident:
Employee(s) Involved:	

NOTE: ** EXPLAIN, In-Detail, the incident in your own words. Your statement is important in determining the causes of the incident and to correct any unsafe conditions.

I have written the above of statement and I certify is true to the best of my knowledge and ability.

Witness Signature:	Date:

5.0 PROTECTION FROM WILDFIRE SMOKE (Cal-OSHA REQUIREMENT)

PURPOSE:

BCCI Construction, LLC will follow the procedures in this program to protect our personnel from wildfire smoke and comply with the Cal-OSHA Protection from Wildfire Smoke Standard, *Title 8, CCR, Section §5141.1.*

SCOPE:

This program will apply when it can be expected when our personnel may be exposed to wildfire smoke and the current Air Quality Index (AQI) for PM 2.5 is greater than <151. This program does NOT apply to the following workplaces or operations:

- Enclosed buildings where windows, doors, and other openings are kept closed and the air is filtered by mechanical ventilation.
- Enclosed vehicles where windows, doors, and other openings are kept closed and the air is filtered by a cabin air filter.
- Where worksite measurements of PM 2.5 show the current AQI does not equal or exceed <151.
- Employees exposed to a current AQI of >151 or greater for less than one-hour during their shift.
- Firefighters engaged in wildland firefighting.

RESPONSIBILITIES:

OVERALL PROGRAM MANAGEMENT:

This specific program will be managed by Matty Kernen, Director of Safety and Tony Fisher, Safety Coordinator, and maintenance of this program will consist of the following:

- Review, Maintain, and Update this program.
- Provide training to personnel who are covered by this program.
- Maintain an adequate supply of N95 Respirators.
- Ensure this program is being followed and enforced.

SUPERVISOR RESPONSIBILITIES:

- Attend all training sessions.
- Determine the AQI when personnel may be exposed to wildfire smoke.

- Check the AQI PM 2.5 level before each shift and periodically during the day or shift when the AQI exceeds >151.

- Inform personnel periodically of the current AQI for PM 2.5 and the protective measures available.

- Implement control measures for outdoor workers (structures) exposed to wildfire smoke.

- Ensure availability of N95 Respirators and enforce required Respirator use when the AQI PM 2.5 is greater than >500.

- Act when personnel report symptoms of poor air quality, such as providing clean air-breaks or remove personnel from poor AQI environments.

EMPLOYEE RESPONSIBILITIES:

Personnel working outdoors exposed to wildfire smoke have the following responsibilities:

- Understand and follow the requirements of this program.

- Attend ALL Training sessions.

- Speak with your Doctor if there are health issues which affect your ability to wear a respirator and if health issues exist, tell your supervisor and Director of Safety or Safety Coordinator about them.

- Wear a Respirator when the AQI PM 2.5 is greater than >500.

- Request an N95 Respirator for voluntary use when AQI PM 2.5 is greater than >151.

- Inform your supervisor and Safety Division if the Air Quality is getting worse.

- Inform you supervisor and Safety Division if suffering from symptoms of poor Air Quality (e.g., asthma attacks, chest pain, nausea, or trouble breathing).

DETERMINING EXPOSURE:

Air Quality is described by using the US EPA's Air Quality Index (AQI) – the higher the number, the more polluted and hazardous the air. The current AQI is divided into the six categories shown in Table 1 below. Small particulates, known as PM2.5, pose the greatest health hazard because they can be inhaled deep into the lungs. Therefore, PM2.5 is the pollutant to monitor when working outdoors during wildfire activity.

Air Quality Index (AQI) - Categories for PM2.5	
Index Value	**Description of Air Quality**
0 to 50	Good
51 to 100	Moderate
101 to 150	Unhealthy for Sensitive Groups
151 to 200	Unhealthy
201 to 300	Very Unhealthy
301 to 500	Hazardous

Table 1 – AQI Categories, Title 40 CFR, Part 58, Appendix G

The Safety Division, All Field Operations Managers, and Superintendents will determine the potential personnel exposure to PM 2.5 before each shift and periodically thereafter to protect the health of personnel by any of the following methods:

- Check AQI forecasts and current AQI PM 2.5 by consulting the following online resources:
    - US EPA AirNow.
    - US Forest Service Wildland Air Quality Response Program.
    - California Air Resources Board.
    - Local Air Quality Management District.
    - Local Air Pollution Control District.
- Obtain AQI forecasts and current AQI for PM 2.5 directly from the EPA, California Air Resources Board.

COMMUNICATION OF THE HAZARD:

The Safety Division, Field Operations Managers, and Superintendents will communicate the wildfire smoke hazard in such a way to ensure they are understood by all personnel. Information provided to personnel will include the current AQI for PM 2.5 and the protective measures available to them to reduce wildfire smoke exposure.

Personnel are encouraged to inform the Superintendent / Supervisor of worsening Air Quality and any adverse symptoms they may be experiencing due to the wildfire smoke exposure (e.g., asthma attack, chest pain, nausea, or difficulty breathing).

EXPOSURE CONTROL:

BCCI Construction, LLC will use the following controls to reduce personnel exposure to PM. 2.5:

- Engineering Controls will be used first to reduce personnel exposure to PM 2.5:
- Enclosed buildings, structures, or vehicles where the air is mechanically filtered – air which is force by a fan through a filtering material which traps particles and removes them from the air – will be provided when feasible.

- The goal is to reduce exposure to an AQI of less than <151 or as much as possible.
- Administrative Controls will be implemented if the Engineering Controls are unable to reduce PM 2.5 exposure to less than a current AQI of less than <151, such as:
- Relocating work activities to a location where the current AQI for PM 2.5 is lower, such as buildings or vehicle with filtered air.
- Changing Work Schedules.
- Lowering Work intensity to reduce breathing and heart rate.
- Providing rest areas with filtered air.
- Allowing extended or additional rest periods (work rest cycle).

NOTE: Engineering and Administrative Controls DO NOT apply to emergency situations when operations (e.g., medical, communications, utilities) are directly aiding firefighting or emergency response. In these situations, N95 Respirators will be provided for voluntary use when AQI for PM 2.5 is equal or greater than >151 per Section §5141,1(f)(4).

- Respiratory Protection will be provided as follows:
  - Voluntary use for AQI of 151-500. NIOSH approved N95 Respirators (filtering face piece) will be provided by BCCI Construction, LLC and affected personnel will be encouraged to use them whenever the current AQI for PM 2.5 is equal or greater than >151. N95 filtering face piece respirators will be stored, maintained, and replaced so the DO NOT create a health hazard to the wearer.
  - Required use for AQI greater than >500. Respirator use is required when the current AQI for PM 2.5 is greater than >500. Required respirator use must follow the requirements of *Title 8, CCR, Section §5144*, which includes training, medical evaluation, and fit testing for the respirator users. The protection provided by the respirator during these conditions must reduce the AQI PM 2.5 to below <151 while inside the respirator.

NOTE: When the AQI is above >500, respirators with a higher assigned protection factor (APF) than an N95 respirator, such as a full-face respirator or a powered-air-purifying respirator (PAPR), may be necessary.

TRAINING:

Training will be provided by Matty Kernen, Director of Safety or Tony Fisher, Safety Coordinator to all personnel and supervision with potential exposure to wildfire smoke. This training will include the following topics:

- The health effects of wildfire smoke.
- The right to obtain medical treatment without fear of reprisal.
- How to obtain the current AQI for PM. 2.5.
- How BCCI Construction, LLC will communicate harmful AQI and protective measures available.
- How personnel should inform BCCI Construction, LLC of worsening Air Quality or if they are experiencing any symptoms due to the Air Quality.
- The methods which will be used to protect personnel from wildfire smoke.
- The N95 filtering face piece respirator in the minimum level of protection for wildlife smoke.
- Personnel with a heart or lung problem should consult with a physician prior to wearing an N95 Respirator.
- The importance, limitations, and benefits of using a respirator when exposed to wildfire smoke.
- How to properly put don, doff, use, and maintain the respirators provided by BCCI Construction, LLC.
- Dispose and replace the respirator when it becomes damaged, deformed, or increase breathing resistance.

6.0 HAZARD COMMUNICATION (Cal-OSHA REQUIREMENT)

As required by California's Hazard Communication (HazCom) Regulation (T8 CCR §5194), BCCI Construction, LLC has developed this Hazard Communication Program, which we implement and maintain as an important component of our Injury and Illness Prevention Program (T8 CCR §3203) to enhance our employees' health and safety. The Hazard Communication Program Managers, [Matty Kernen, Director of Safety & Tony Fisher, Safety Coordinator], has full authority and responsibility for the implementation and maintenance of this program.

Our goal is to provide information to all personnel on our worksite — including other employers and their employees — about the hazardous chemicals in our workplace, the associated hazards, and the control of these hazards through a program including the elements listed below. We expect contractors bringing hazardous chemicals into our workplace to do the same via their own written HazCom Program.

LIST OF HAZARDOUS CHEMICALS

The Director of Safety in conjunction with the project Superintendent and Project Team will prepare and keep current a list of all known hazardous chemicals present in our workplace which are in use or in storage (see attached Hazardous Chemical List) and, at the same time, verify we have the most current safety data sheets (SDSs). The product identifiers listed will match those on the corresponding container labels and SDSs. Specific information on each noted hazardous chemical can be obtained by reviewing the corresponding label and SDS.

PROPOSITION 65 LIST OF CHEMICALS

The Director of Safety is responsible for obtaining updates of Proposition 65 listed chemicals and providing new information to affected employees. In the case of newly added chemicals to the Proposition 65 list, the additional warning requirements will take effect within 12 months from the date of listing.

SAFETY DATA SHEETS (SDSs)

The Superintendent is responsible for obtaining the SDSs corresponding to our Hazardous Chemical List, reviewing them for completeness, maintaining the safety data sheet system for our company and ensure the Director of Safety reviews all SDSs to ensure chemicals on the Proposition 65 listing are NOT authorized onsite.

Should an SDS not be received with or prior to receipt of the initial shipment of a hazardous chemical, or with the first shipment after a SDS is updated, an SDS will be requested as soon as possible from the manufacturer or distributor. If the SDS(s) are not provided upon request, the manufacturer or distributor will, within seven days of noting this missing information, be requested in writing to provide the required information Director of Safety will forward a copy of this written request to Cal/OSHA if a response is not received from the manufacturer or distributor within 25 days.

If a new or revised SDS is received significantly indicates an increased risk(s) or measure(s) needed to protect employee health, this information will be conveyed to employees within 30 days by.

If we become aware of any significant information regarding the hazards of a chemical, or ways to protect against the hazards, this new information will be added to the SDS within three months.

Legible SDS copies for all hazardous chemicals to which employees of this company may be exposed are kept in [Describe procedures that will ensure that they are readily accessible during each work shift to employees when they are in their work area(s). Electronic access and other alternatives to maintaining paper copies of the safety data sheets are permitted if no barriers to immediate employee access in each workplace are created by such options]. SDSs are readily available for review by all employees in their work area and during each work shift without the need to ask someone.

Should any of our employees work at more than one geographical location, the SDSs will be kept at [Describe the primary workplace central location and how employees can immediately obtain the required information in an emergency].

Employees are to contact [Type the name of person or position] if they have a specific question or need additional information on a SDS.

(Delete this paragraph if your company only uses SDS hard copies.) We use the following alternatives to paper SDSs: [Describe in detail how employees will have ready access to SDSs via electronic means and how they will know how to use the equipment and software as well as make hard copies, if needed.] Our backup system in the event of failure of the primary SDS retrieval system will be [Describe the backup system in detail, including how hard copies will be made readily available as needed].

SDSs (and the older Material Safety Data Sheets) constitute an “employee exposure and medical record” and will be kept according to T8CCR section 3204 requirements. [Describe how this will be done in your workplace].

LABELS AND OTHER FORMS OF WARNING

Before hazardous chemical containers are released to the work area, it is the policy of our company that [Provide name of person or position] will verify that all containers are properly labeled as follows.

Original containers received from the manufacturer, distributor, importer:

- Product identifier
- Signal words
- Hazard statements
- Pictograms
- Precautionary statements
- Name, address, and telephone number of the manufacturer, importer, or other responsible party

Workplace containers where the contents of the original containers received from the manufacturer, distributor, importer have been transferred into one of our own containers or provide the:

- Product Identifier

- Words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical

We will not remove or intentionally deface existing labels on incoming containers of hazardous chemicals unless the container is immediately marked with the required information.

Portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer are not required to be labeled.

The Safety Division & Project Superintendent will utilize the following procedures to review and update label information when necessary:

If we become aware of any significant information regarding the hazards of a chemical, we will revise the labels for the chemical within six months of becoming aware of the new information.

To address exposures to Proposition 65 chemicals which do not fall under the requirements of the Cal/OSHA §5194 Hazard Communication Regulation, the Safety Division will:

- Providing a warning to employees in compliance with California Code of Regulations Title 22 (22 CCR) Section §12601(c) in effect on May 9, 1991.

- Complying with the requirements set forth in subsections (d) through (k) of Cal/OSHA Title 8 CCR §5194.

EMPLOYEE INFORMATION AND TRAINING

- Employees are to attend a HazCom Program training session set up by Human Resources and Safety Division at the time of their initial assignment and whenever a new chemical hazard is introduced into the work area. This training session will be performed via New Hire Orientation and Job Safety Orientation and provide:

- The requirements of the Hazard Communication Regulation, including the employees' rights under the regulation.

- The location and availability of the Written HazCom Program (Contained in this Manual) and listing of hazardous chemicals and SDSs on each project.

- Any operation in the work area of personnel, including non-routine tasks, where hazardous chemicals, or Proposition 65 carcinogens & reproductive toxins are present, and exposures are likely to occur.

- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.

- Protective practices the company has taken to minimize or prevent exposure to these substances.

- The details of our HazCom Program, including how to read labels and review SDSs to obtain hazard information, and an overview of our workplace-specific labeling procedures for original and workplace containers, as well as stationary processes.

- Physical and health effects of the hazardous chemicals either individually or as hazard groups. Chemical-specific information will always be available through labels and safety data sheets.

- Symptoms of overexposure.

- Measures employees need to put into practice to reduce or prevent exposure to these hazardous chemicals by engineering controls, work practices, and use of personal protective equipment.

- Emergency and First Aid procedures to follow when and if employees are exposed to hazardous chemicals.

- The location and interpretation, if needed, of warning signs or placards to communicate when a chemical is known to cause cancer or reproductive toxicity and is being used in the workplace. (NOT Allowed per Proposition 65 and BCCI Construction, LLC).

Employees will receive additional training as soon as possible when a new hazard is introduced into the workplace or whenever employees might be exposed to hazards at another employer's worksite. Training will be documented via the attached Hazard Communication Employee Training Roster.

HAZARDOUS NON-ROUTINE TASKS

Periodically, our employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, affected employees will be given information by their supervision on the hazards to which they may be exposed during such an activity.

This information will cover:

- Specific hazards.

- Measures the company has taken to reduce the risk of these hazards, such as providing ventilation, ensuring the presence of another employee, providing a respiratory protection program which meets T8 §5144 requirements, and establishing emergency procedures.

- Required Personal Protective Equipment and Safety Measures.

Non-Routine tasks performed by personnel at BCCI Construction, LLC, and the associated Hazardous Chemical.

Task	Hazardous Chemical(s)
[Enter non-routine task]	[Enter hazardous chemicals listed on the SDS or the SDS identifier for the mixture]

LABELED/UNLABELED PIPES

Above-ground pipes transporting hazardous chemicals (gases, vapors, liquids, semi-liquids, and plastics) will be identified in accordance with T8 CCR, §3321, "Identification of Piping."
[If applicable, list the pipes in question and the corresponding hazard controls to be implemented.]

Before employees enter the area and initiate work on or near pipes, the Project Superintendent will inform them of:

- The location of the pipe or piping system or other known safety hazard.
- The chemicals in the pipe.
- Potential hazards.
- Safety pre-cautions.

INDEPENDENT CONTRACTORS AND TEMPORARY EMPLOYEES WORKING IN OUR WORKPLACE

To ensure outside contractors work safely at our workplace and to protect our employees from chemicals used by outside contractors, the Project Superintendent is responsible for arranging two-way access of the following information with respect to contractors or other employers in our workplace:

- Hazardous chemicals, including Proposition 65 chemicals, to which they may be exposed while on the job site as well as chemicals they will be bringing into the workplace. To this end, we will provide contractors with information on our labeling system and access to SDSs.
- Pre-cautions and protective measures the employees may take to minimize the possibility of exposure.

SAMPLE HAZARD CHEMICAL LIST

Hazardous Chemical (Product identifier matches SDS and label)	Operation/Work Area	SDS (date)

SAMPLE EMPLOYEE HAZARDOUS COMMUNICATION TRAINING ROSTER

Content of Training will be Outlined in our Written HAZCOM Program.

DATE: DEPARTMENT:

Name & Title of Person Conducting Training:

- ☐ Initial
- ☐ Remedial Training
- ☐ Newly Introduced Chemical Product (Identified):

Employee Name	Signature

SAMPLE TRAINING TOPIC CHECKLIST

- Requirements of T8 CCR §5194.
- Operations where hazardous chemicals are present.
- Location and availability of the Written Hazard Communication Program, including the list of hazardous chemicals and safety data sheets.
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area.
- The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area.
- The measures employees can take to protect themselves from these hazards, including specific procedures implemented to protect employees from exposure to hazardous chemicals.
- Details of the Hazard Communication Program, including an explanation of the labels received on shipped containers and the workplace labeling system, safety data sheets, and how employees can obtain and use the appropriate hazard information.

EMPLOYEE RIGHTS

- To personally receive information regarding hazardous chemicals to which they may be exposed.
- For their physician or collective bargaining agent to receive information regarding hazardous chemicals to which the employee may be exposed.
- Against discharge or other discrimination due to the employee’s exercise of the rights afforded pursuant to the provisions of the Hazardous Substances Information and Training Act.
- Other [enter other topics applicable to your workplace]

SAMPLE SDS REQUEST LETTER

DATE:

MANUFACTUER or DISTRIBUTOR:

ADDRESS:

RE: SDS for Listed Product Identifier

Product name on label	Additional identifying information

Please provide me with an up-to-date copy of your Safety Data Sheet (SDS) for the above product(s). The SDS is needed for compliance with the State of California Hazard Communication Regulation, title 8, California Code of Regulations, section 5194.

Please send the SDS to:

BCCI Construction, LLC
ATTN: Matty Kernen, Director of Safety
1160 San Francisco, Suite 250
San Francisco, CA, 94111

Or e-Mail to:

bccisafety@bcciconst.com

Please notify BCCI in writing if this product DOES NOT Require an SDS.

If there are any questions regarding our request, please contact the Director of Safety at (415) 264-380.

V/r

Matty Kernen
Director of Safety, BCCI Construction, LLC

7.0 HEAT ILLNESS PREVENTION PROGRAM (Cal-OSHA REQUIREMENT)

PURPOSE:

The purpose of the BCCI Construction, LLC Heat Illness Prevention Program is to prevent heat related illness from occurring through education and proper work practices. This program also teaches individuals how to recognize the signs and symptoms of heat illness, and how to response should heat related illnesses occur. Heat related illness is a serious medical condition which is a result when the body is unable to cool itself sufficiently through sweating. Both personal and environmental factors contribute to the likelihood of developing heat related illnesses, which include heat stress, heat exhaustion, and ultimately heat stroke. Heat Stroke can be fatal; especially if medical treatment is delayed.

BCCI Construction, LLC understands our personnel who work in a hot environment for extended periods of time are at risk of suffering from a heat-related illness and every employee does have the right to a heat-illness-free workplace.

BCCI Construction, LCC is committed to taking every pre-caution to protect personnel who could potentially be exposed to heat stress, including establishing safe work practices, heat-illness prevention controls, and emergency preparedness; all of which will be detailed in this plan. BCCI Construction, LLC will comply with all Local, State, and Federal Regulations, Standards, Directives, to include best practices.

This program is written to comply with California Occupational Safety and Health (Cal/OSHA) regulations for Heat Illness Prevention; *California Code of Regulation (CCR) Title 8, Section 3395.*

APPLICABILITY:

The BCCI Construction, LLC Written Heat Illness Prevention Program; through the requirements of this manual, establishes procedures and responsibilities for BCCI Personnel who are engaged in all work-related activities indoors & outdoors.

This program is applicable to all Divisions within the Company; at all offices, jobsite locations, and any location the company operates where it could be reasonably anticipated where a heat illness could occur. The Heat Illness Prevention Standard (*CCR, Title 8, Section 3395*) requires all employers to take certain steps to prevent heat illness have been outlined in this document.

RESPONSIBILITIES:

SENIOR LEADERSHIP & DIVISION HEADS:

Senior Leaders and Division Heads are responsible for:

- Providing the necessary resources to ensure the health & safety of our personnel.
- Identify personnel and ensure they are trained on their health and safety responsibilities.
- Ensure compliance with all company health & safety policies and procedures.
- Ensure workplace hazards are identified, controlled, mitigated, and abated promptly.

PROJECT MANAGERS, FIELD OPERATIONS MANAGERS, SUPERINTENDENTS:

Leaders who supervise personnel which perform work outdoors and indoors; where heat-related illnesses could be reasonably anticipated are responsible for the following:

- Ensure all personnel understand and comply with the requirements of this program.
- Ensure a Written Heat Illness Prevention Plan covers the jobsite.
- Develop & Implement Procedures to comply with the requirement of this program.
- Ensure personnel have completed and documented Heat Illness Prevention Training.
- Be Aware of Risk Factors associated and contributing to Heat Illness.
- Reduce the Risk of Heat Illness by implementing special pre-cautions as necessary.
- During Hot Conditions, allow personnel to acclimate to these conditions.
- Ensure Employees are accounted for in Hot Conditions at the end of their shift.
- Ensure Potable Drinking water is always available to personnel.
- Ensure the necessary Personal Protective Equipment (PPE) to reduce heat stress (e.g., sun hats, light colored clothing, etc.) is worn when necessary.
- Monitor Weather Conditions: implement High-Heat Procedures when temperatures exceed 90° Fahrenheit.
- Ensure procedures to contact Local Emergency Medical Services (EMS) are established and in place (Reference Project Health & Safety Plan (HASP)).
- Arrange for transportation of employees to a meeting point where they can be reached by local EMS.

- Know what to do should a Heat Illness Emergency occur and how to summon for local EMS & Responders.

EMPLOYEES:

All Personnel are responsible for:

- Understand and Comply with Company Health & Safety Policies & Procedures.

- Notify Supervisor, Director of Safety, or Safety Coordinator about any hazardous conditions observed at the jobsite.

- Inform Supervisor of any factors which can increase their risk of a Heat Related Illness.

- Immediately report the signs or symptoms of Heat Illness in themselves or others their Supervisor, Director of Safety, or Safety Coordinator.

DIRECTOR OF SAFETY – SAFETY COORDINATOR:

The BCCI Construction, LLC Heat Illness Prevention Program is administered by the company Director of Safety (Matty Kernen) and Safety Coordinator (Tony Fisher). The Safety Division functions as a resource for the entire company and will assist all personnel in the compliance of their responsibilities to this program. The Safety Division is specifically responsible for:

- Develop, Implement, and Sustain the BCCI Heat Illness Prevention Program ensuring this Program meets all applicable regulatory requirements.

- Develop and Provide Heat Illness Prevention Training.

- Review and Update the BCCI Heat Illness Prevention Program and other written materials as regulations, standards, and directives change.

DEFINTIONS:

Acclimatization: means; temporary adaption of the body to work in the heat which occurs gradually when a person is exposed to. Acclimatization peaks in most people within four to fourteen days or regular work for at least two hour per day in the heat.

Environmental Risk Factors: means; working conditions which create the possibility of heat illness, including air temperature, relative humidity, radiant heat from the sun and other sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees.

Heat Illness: means; an illness which develops because of heat stress; to include, heat cramps, heat exhaustion, and heat stroke.

Heat Stress: means; stress on the body; due to high temperatures or exertion, which can lead to heat illness if left unchecked.

Heat Wave: means; temperatures which are consistent of 80° Fahrenheit of higher; and anytime the temperature is 10° (degrees) higher than the average daily temperature within the preceding five days.

Personal Risk Factors: means; factors associated with a person's age, degree of acclimatization, health, water, alcohol, and caffeine consumption, and use of prescription medication which affects the body's water retention or other physiological response to heat.

Shade: means; blockage of direct sunlight. Shade is considered sufficient when objects cast a shadow in the area blocked sunlight. If shade is not adequate when heat is in the area shade defeats the purpose of shade, which is to allow the body to cool. (e.g., a car sitting in the sun does NOT provide acceptable shade for a person inside it, unless the car is running with air conditioning). Shade may be provided by any natural or artificial means if it does NOT expose employees to unsafe or unhealthy conditions or deter or discourage access or use.

Temperature: means; the dry bulb temperature in degrees Fahrenheit obtainable by using a thermometer to measure the outdoor temperature in an area where there is NO shade. While the temperature measurement must be taken in an area of full sunlight, the bulb or sensor of the thermometer should be shielded while taking the measurement (e.g., with the hand or some other object) from direct contact by sunlight.

TYPES OF HEAT ILLNESS, RISK FACTORS, AND AT RISK PERSONNEL

TYPES OF HEAT ILLNESS AND FIRST AID:

There are several types of heat-related illnesses. The following section will explain the symptoms, causes, and First Aid procedures for each type of heat-related illness. All signs or symptoms of heat illness MUST be reported immediately to a Supervisor, Director of Safety, or Safety Coordinator.

If a supervisor observes, or any personnel reports, any signs, or symptoms of heat illness in an employee, the supervisor shall take immediate action commensurate with the severity of the illness. If the signs or symptoms are indicators of severe heat illness (e.g., decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, or convulsions) Local Emergency Medical Services (EMS) response procedure shall be activated and implemented. Personnel exhibiting signs or symptoms of heat illness shall be monitored and **NOT** left alone or sent home without being offered onsite First Aid or treatment / assessment provided by Local EMS.

HEAT STROKE:

Heat Stroke is the most serious heat-related disorder. This occurs when the body becomes unable to control its temperature; the body's temperature rises rapidly, the sweating mechanism fails, and the body is unable to cool down. When Heat Stroke occurs, the body temperature can rise to 106° Fahrenheit or higher within 10-15 minutes. Heat Stroke can cause death or permanent disability if emergency treatment is **NOT** administered.

HEAT STROKE SYMPTOMS:

- Hot, Dry Skin or Profuse Sweating, Hallucinations, Chills, Throbbing Headache.
- High Body Temperature, Confusion, Dizziness, Slurred Speech

HEAT STROKE FIRST AID:

- Contact Local Emergency Medical Service (EMS) & Notify Supervisor, Director of Safety, and Safety Coordinator.
- Move Employee to a cool, shaded, or air-conditioned area.
- Cool the Employee using the following methods:
    - Loosening or Removing Clothing.
    - Soaking their Clothes with Water.
    - Spraying, Sponging, or Showering them with water.
    - Fanning their Body.

HEAT EXHAUSTION:

Heat Exhaustion is the body's response to an excessive loss of water and salt, usually through excessive sweating. Workers most prone to heat exhaustion are those of the elderly, high blood pressure, and those working in an **HOT** environment.

HEAT EXHAUSTION SYMPTOMS:

- Heavy Sweating, Extreme Weakness, Fatigue, Dizziness, Confusion.
- Nausea, Clammy – Moist Skin, Pale or Flushed Complexion.
- Muscle Cramps, Slightly Elevated Body Temperature, Fast & Shallow Breathing.

HEAT EXHAUSTION FIRST AID:

- Contact Local Emergency Medical Service (EMS) & Notify Supervisor, Director of Safety, and Safety Coordinator.
- Move Employee to a cool, shaded, or air-conditioned area and allow to rest.
- Encourage personnel to drink water or other cool, non-alcoholic, or non-caffeinated beverages.
- Cool the Employee by using methods such as:
    - Loosening or Remove Clothing.
    - Soaking their Clothes with Water.
    - Spraying, Sponging, or Showering the with Water.
    - Fanning the Body.

HEAT SYNCOPE:

Heat Syncope is a fainting (Syncope) episode or dizziness which usually occurs with prolonged standing or sudden rising from a sitting or lying position. Factors which may contribute to heat syncope include dehydration and lack of acclimatization.

HEAT SYNCOPE SYMPTOMS:

- Light – Headedness, Dizziness, Fainting

HEAT SYNCOPE FIRST AID:

- Contact Local Emergency Medical Service (EMS) & Notify Supervisor, Director of Safety, and Safety Coordinator.
- Have Employee sit or lie down in a cool, shaded, or air conditioned are and allow them to rest.

- Encourage employee to drink water or other cool non-alcoholic or non-caffeinated beverages.

HEAT CRAMPS:

Heat Cramps usually affect workers who sweat a lot during strenuous activity. This sweating depletes the body's salt and moisture levels. Low salt levels within the muscles causes painful cramps. Heat Cramps may also be a symptom of Heat Exhaustion.

HEAT CRAMP SYMPTOMS:

- Muscle Pain or Spasms are usually in the abdomen, arms, or legs.

HEAT CRAMP FIRST AID:

- Stop all Activity and sit in a cool place, Drink Clear Juice, or a Sport Beverage.
- **DO NOT Return** to strenuous work for a several hours after the cramps subside because further exertion may lead to Heat Exhaustion or Heat Stroke.
- Seek Medical Attention if or any of the following apply:
    - The Employee has Heart problems.
    - The Employee is on a low-sodium diet.
    - The Cramps **DO NOT** subside within an hour

HEAT RASH:

A Heat Rash occurs when sweat ducts become clogged and the sweat cannot get to the surface of the skin. Instead, the sweat becomes trapped beneath the skin's surface causing a mild inflammation or rash.

HEAT RASH SYMPTOMS:

- Heat Rash looks like a red cluster of pimples or small blisters.
- This is most likely to occur on the neck and upper chest, the groin, under the breasts, and in elbow creases.

HEAT RASH FIRST AID:

- Work in a cooler or less humid environment when possible.
- Keep the affected area dry.
- Dusting powder may be used to increase comfort.
-

PERSONAL AND ENVIRONMENTAL RISK FACTORS

There are several factors which can increase the likelihood of personnel experiencing Heat-Related Illnesses. Often Heat-Illness results from a combination of environmental and personal risk factors.

ENVRIONMENTAL RISK FACTORS:

Environmental Risk Factors are the working conditions which increase the likelihood of personnel experiencing a Heat-Related Illness. These Factors Include:

- High Humidity.
- Warm Weather
- Limited Air Movement; and
- Direct Exposure to the Sun or other Heat Sources

PERSONAL RISK FACTORS:

Personal Risk Factor are those factors which affect how well an employee responds to heat.

These Factors Include:

- Age, Weight, and Physical Condition.
- Consumption of Water, Alcohol, Drugs, and Caffeine.
- Use of Prescription Medications which affect heat tolerance.
- Degree of Acclimatization.

JOB-RELATED RISK FACTORS:

An Employee's job duties may play a role in the likelihood of experiencing Heat-Related Illnesses, for example:

- Physical Exertion and Duration of Exertion.
- Protective Clothing and Personal Protective Equipment (PPE) worn by personnel.

AT RISK EMPLOYEES:

Although BCCI Construction, LLC typically works within a mild climate; there are areas and times when environmental conditions can increase the risk of Heat-Related Illnesses. The following are examples of types of personnel who may be susceptible to these conditions:

- Field Operations Managers
- Senior Superintendents
- Superintendents
- Labor Foreman
- Lead Laborers
- Laborers
- Director of Safety
- Safety Coordinator
- Project Managers
- Assistant Project Managers
- Project Engineers

HEAT ILLNESS PREVENTION PROCEDURES

BCCI Divisions and their supervisors and managers are responsible for the development, implementation, and maintenance of effective procedures to reduce the risk of Heat-Related Illnesses. These procedures shall be in writing and include specific Heat Illness Prevention Measures and Emergency Response Procedures for each jobsite location. Personnel should review their procedures on a regular basis and update them as needed. The BCCI Safety Division is available and upon request; to assist in the evaluation of job-tasks, procedures, processes, and environmental conditions at the jobsite.

HEAT ILLNESS PREVENTION PLAN:

A Heat Illness Prevention Plan shall be developed and implemented at each jobsite; where it could be reasonably anticipated a Heat-Related Illness could occur. The plan shall be in writing and be readily available at the jobsite upon request of employees and representatives. The Heat Illness Prevention Plan at a minimum shall contain the following:

- Procedures for the Provision of Water and Access to Shade.
- Acclimatization Procedures, Emergency Response Procedures.
- High Heat Procedures, where applicable.

HEAT ILLNESS PREVENTION MEASURES:

Superintendents, Director of Safety, and Safety Coordinator are responsible for the development of procedures for the following measures and ensure they are being implemented, accordingly at their jobsite; to aid in the prevention of Heat Illness amongst personnel.

MONITORING OF WEATHER CONDITIONS:

The Director of Safety, Safety Coordinator, and Superintendents are responsible for the monitoring of weather conditions and scheduling work appropriately. All personnel shall be closely observed by a superintendent or a designated representative during the heat wave. Ensure to monitor the weather at the specific location(s) where work activities are occurring.

Prior to the start of the next duty day; have the designated person check the weather forecast in the areas of work activities. The Weather can be monitored by the utilization of local radio and television stations, websites, and electronic or other devices. Refer to the Reference and Resources section of this plan for specific weather monitoring resources.

WORK SCHEDULING:

As there is **NO** absolute temperature cut-off, below which, Heat Illness ceases to be a risk. Heavy work conducted in high humidity; especially if workers are wearing Protective Clothing or are **NOT** Acclimated; can present a risk even at an Ambient Temperature of 70° F or below. Whenever possible; Superintendents shall schedule Heavy Work during cooler times of the day as this will mitigate or reduce the risk of Heat Illness to personnel.

ACCLIMATIZATION:

Acclimatization is a process by which the body adjusts to increased heat exposure. Personnel are more likely to develop Heat-Related Illnesses if they are **NOT** allowed or encouraged to take it easy when a heat wave arrives; or when they start a new job which exposes them to heat. Acclimatization is fully achieved in most people within a four (4) to fourteen (14) days of regular work, which involves at least two (2) hours per day in the heat.

DRINKING WATER:

Superintendents shall ensure personnel always have access to potable drinking water. Drinking water shall be fresh, pure, suitably cool, and provided to employees free of charge. The water shall be located as close as practicable to the areas where employees are working.

Where drinking water is **NOT** plumbed or otherwise continuously supplied, water shall be provided in sufficient quantity at the beginning of the tour of duty and provide one quart per person per hour for drinking for the entire tour. Personnel may begin the tour with smaller quantities of water only if they have effective procedures for replenishment during the tour as needed to allow employees to drink one quart or more per hour.

The frequent drinking of water shall be encouraged. BCCI Construction, LLC provide multiple cases of case water for BCCI personnel working at the jobsite. Superintendents must contact the company shop to replenish stock. Additionally, all trades are required to provide their own cases of water.

REST BREAKS:

BCCI encourages all personnel during the heat waves or rises in heat to take a preventative cool-down rest in the shade for a period of **NO** less than five minutes at a time when they feel the need to do so to protect themselves from overheating. An employee who takes a preventative cool-down period shall be monitored and asked if they are experiencing any symptoms of heat illness; shall be encouraged to remain in the shade; and shall **NOT** be ordered back to work until the signs or symptoms of heat illness have abated (subsided).

SHADE:

Superintendents shall ensure shade is available to their personnel when the temperature exceeds 80° Fahrenheit, and upon employee request when temperatures are below 80° Fahrenheit.

When the temperature in the work area exceeds 80° Fahrenheit, the employer shall always have and maintain one or more areas of shade while employees are present or are either open to the air provided with ventilation or cooling. The amount of shade present shall be at least enough to accommodate the number of personnel on recovery or rest periods, so they can sit in a normal posture fully in the shade without having to be in physical contact with each other.

The shade shall be located as close as practicable to the areas where employees are working. Subject to the same specifications, the amount of shade present during meal periods shall be at least enough to accommodate the number of employees on the meal period who remain onsite.

TRAINING:

Documented Heat Illness Training covering the requirements in Section VII of this document shall be provided to all applicable workers before they begin work in HOT environments.

EMPLOYEE MONITORING:

Superintendents should continuously monitor personnel closely for signs and symptoms of Heat Illness. During heat waves and with new personnel, superintendents must be extra-vigilant. All personnel shall be closely observed by a superintendent or designated representative during a heat wave.

A “HEAT WAVE” means any day in which the forecasted temperatures will be at least 80° Fahrenheit and at least 10° Fahrenheit higher than the average high daily temperature in the preceding five (5) days. An employee who has been newly assigned to a high heat area shall be closely observed by a superintendent or designated representative for the first 14 days of the employee's employment.

EMERGENCY RESPONSE PROCEDURES

In conjunction with the Director of Safety, Safety Coordinator; the Superintendent shall develop and implement effective jobsite Emergency Response Procedures. The procedures shall include:

- What an effective communication by voice, observation, or electronic means will be maintained so personnel at the jobsite can contact a Superintendent or Local Emergency Medical Services (EMS) when necessary. An electronic device (e.g., cellular phone or text messaging) may be used for this purpose only if reception in the area is reliable.

- How to respond to signs and symptoms of possible Heat-Illness, including but not limited to First Aid measures and how Local Emergency Medical Services (EMS) will be provided.

- How to contact Local EMS and if necessary, how employees will be transported to a place where they can be reached by Local EMS.

- In the event of an emergency, will clear and precise directions to the jobsite which will be provided as to the Emergency Responders.

In non-remote areas of the San Francisco, Silicon Valley, and Southern California areas; Local EMS are generally available by calling 911. Superintendents are to ensure personnel can provide clear and concise directions to the jobsite. Always ensure personnel have means of communication and knowledge of how to guide Emergency Responders to their location.

If the Superintendents observes, or any person reports, any signs, or symptoms of Heat Illness in an employee; the superintendent shall immediately be commensurate with the severity of the illness. If the signs or symptoms are indicators of severe Heat-Illness (e.g., decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, or convulsions); the Emergency Response Procedures shall be activated.

An employee exhibiting signs or symptoms of Heat Illness shall be monitored and shall NOT be left alone or sent home without being offered Onsite First Aid or being provided with services of EMS.

Superintendents must reiterate to all personnel the importance of immediately reporting any symptoms of Heat-Illness in themselves or co-workers and remind plus remind employees what to do in case of Emergency Medical Treatment is required or needed.

On-Site Health & Safety Services	(866) 998-2750 24 Hours – 7 Days a Week	
Local Fire Department	911	(Reference the Project HASP)
Local Police Department	911	(Reference the Project HASP)

HIGH HEAT PROCEDURES

Superintendents of employees shall implement High-Heat Procedures when the temperature exceed 90° Fahrenheit. These procedures must include the following to the practical extent possible:

- Schedule work to off-hours or cooler hours of the day and if possible, postpone work until the ambient temperatures subside.

- Ensure effective communication by voice, observation, or electronic means is maintained so personnel at the jobsite can contact the superintendent.

- Remind personnel throughout the jobsite to Hydrate throughout their tour of duty.

- Appoint one or more persons at the jobsite as an authorized representative to contact Local EMS, while allowing other employees to contact Local EMS when no designated employee is available.

- Prior to the start of the tour a meeting shall be held with all employees to review the High-Heat Procedures; also encourage employees to Hydrate throughout their tour of duty; and a reminder for a cool-down period / rest is authorized when necessary.

- Observe personnel for alertness and signs or symptoms of Heat-Illness. The Superintendent shall ensure effective employee observation/monitoring by implementing one or more of the following:

    - Superintendent or Designated Representative of 20 or fewer employees on-site.

    - Mandatory Buddy System.

    - Regular communication with sole person such as by radio/cellular phone.

    - Other effective means of observation.

TRAINING REQUIREMENTS

Effective documentation of Heat Illness Prevention Training meeting the requirement below are provided to all personnel who perform job duties outdoor or indoor work where Heat-Related Illness could be reasonably anticipated to occur.

GENERAL HEAT ILLNESS TRAINING REQUIREMENTS:

All Employees, Supervisory, and Non-Supervisory Personnel shall receive the following training:

- The Company's procedures for compliance requirements of this standard; to include, but not limited to, the Company's responsibility to provide water, shade, cool-down periods, and First Aid as well as the rights or personnel to exercise their right under this standard without retaliation.

- The different types of Heat-Illnesses and the common signs and symptoms of Heat-Illness; to include appropriate First Aid or Emergency Response to the different types of Heat-Illness. In addition, how Heat-Illness may progress quickly from mild signs and symptoms to a serious life-threatening illness.

- The environmental and personal risk factors to Heat-Illness, as well as the added burden of heat load on the body caused by exertion, clothing, and Personal Protective Equipment (PPE).

- The understanding of frequent consumption of water; up to four cups per hour when the work environment is HOT, and employees are likely to be sweating more than usual in the performance of their duties.

- Understanding the concept, importance, and methods of Acclimatization.

- The importance of reporting signs and symptoms of Heat-Illness in themselves or co-workers immediately to the Superintendent, Director Safety and Safety Coordinator.

- The Company's procedures for responding to the signs or symptoms of potential Heat-Illness, which includes how Local EMS will be provided should they become necessary or required.

- In the event of an emergency ensure the procedures with clear and precise directions to the jobsite can and will be provided to local emergency responders. These procedures shall include a designated person to be available who can ensure emergency procedures are invoked when appropriate.

- Special procedures for contacting Local EMS and when necessary; for the transporting of employees to a point where they can be reached by an EMS provider.

- High-Heat Procedures when and if applicable.

ADDITONAL SUPERVISOR HEAT ILLNESS TRAINING:

Prior to the supervision of employees who perform outdoor or indoor work where Heat-Related Illnesses could be reasonably anticipated to occur; the company shall ensure their supervisors shall receive the following training on the below listed topics:

- The Supervisory Requirements under the BCCI Construction Company Illness Prevention Program and the Heat Illness Prevention Standard.
- The procedures to follow when an employee exhibits the signs and symptoms consistent with the potential of Heat-Illness exposure, which include Emergency Response procedures.
- How to monitor the Weather Report and Advisories forecasted and reported for the area where work is being performed.

TRAINING RESCOURCES:

Cal-OSHA Heat-Related Illness Prevention and Information
(http://www.dir.ca.com/dosh/heatillnessinfo.html)

Cal-OSHA Heat Illness Prevention Standard – California Code of Regulation (CCR), Title 8, Section 3395, California Department of Industrial Relations
(http://www.dir.ca.gov/title8/3395.html)

RECORDKEEPING REQUIREMENTS

TRAINING:

The Company shall retain training records for a minimum of ten years after an employee has retired or resigned their employment. All requests shall be made to the Director of Safety or Safety Coordinator at bccisafety@bcciconst.com

REFERENCES and RESOURCES

Cal-OSHA Heat-Related Illness Prevention and Information
(http://www.dir.ca.com/dosh/heatillnessinfo.html)

Cal-OSHA Heat Illness Prevention Standard – California Code of Regulation (CCR), Title 8, Section 3395, California Department of Industrial Relations
(http://www.dir.ca.gov/title8/3395.html)

Weather Underground Information and Forecasting
(http://www.wunderground.com)

National Oceanic and Atmospheric Administration (NOAA) Weather Information
(http://www.noaa/gov/wx.html)

National Oceanic and Atmospheric Administration (NOAA) Heat Index Chart
(http://www.nws.noaa.gov/om/heat/heat_index.shtml)

National Oceanic and Atmospheric Administration (NOAA) Heat Wave Resources
(http://www.nws.noaa.gov/om/heat/index.shtml)

ATTACHMENTS

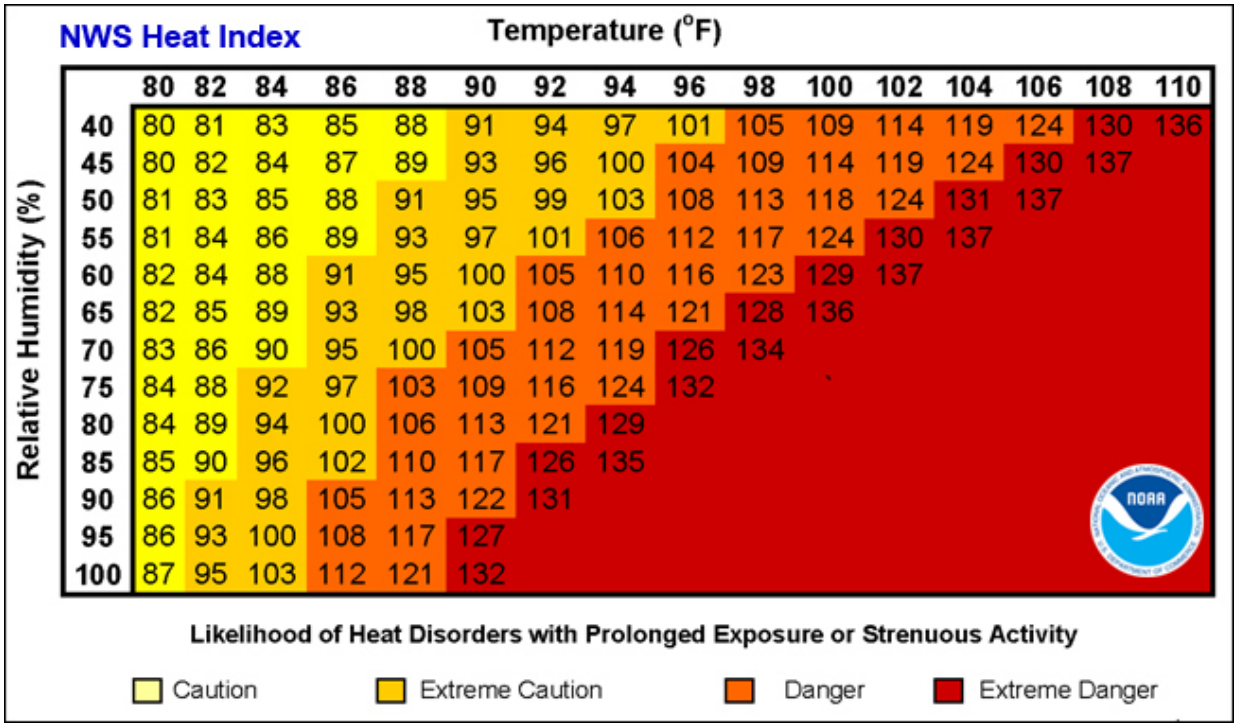
Attachment A: NOAA Heat Index Chart

Attachment B: BCCI Heat-Illness Prevention Program Compliance Checklist

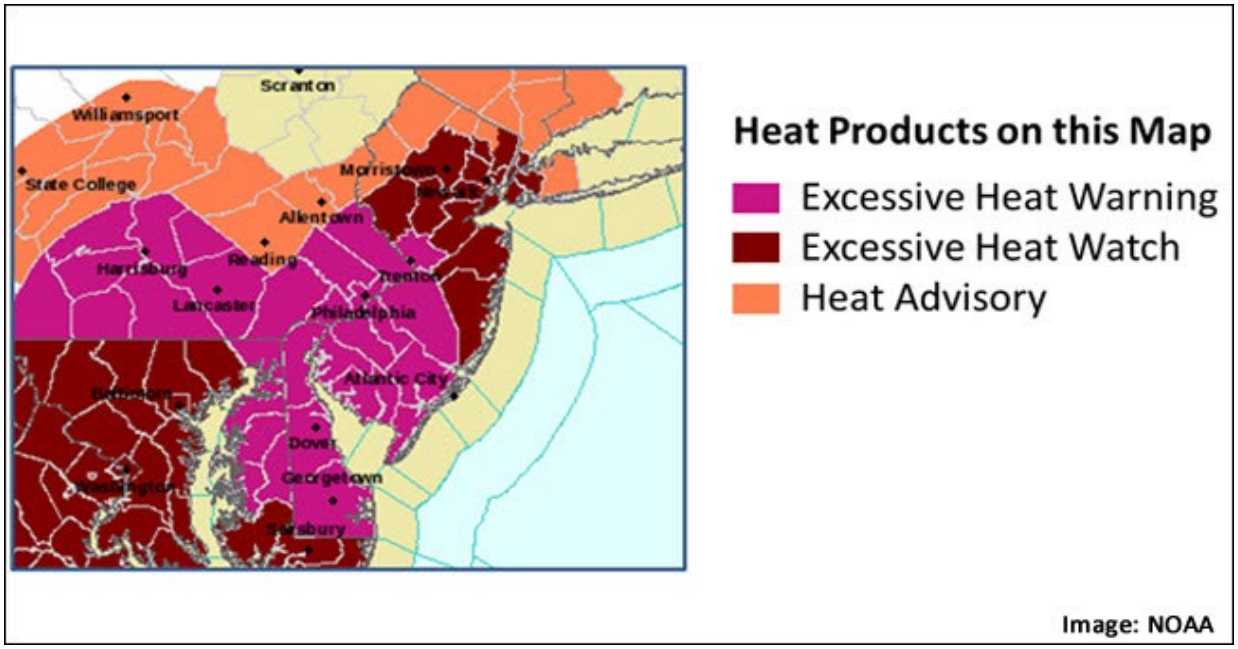
Attachment C: BCCI Heat-Illness Prevention Plan

Attachment D: BCCI Work-Site Specific Heat Illness Prevention Plan

ATTACHMENT A
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION
HEAT INDEX CHART



HEAT WATCH versus HEAT WARNING



ATTACHMENT B

BCCI HEAT-ILLNESS PREVENTION PROGRAM CHECKLIST

Job Site:	Superintendent:
Completed By:	Date:

HEAT ILLNESS PROGRAM APPLICABILITY			
Question	**YES**	**NO**	**Action Required**
Do employees perform work outdoors or indoor areas where Heat-Illness is likely to occur?	☐	☐	If **NO, Stop.** Heat-Illness Prevention Pgm **NOT** required.
TRAINING			
Have employees received Heat-Illness Prevention Training?	☐	☐	If **NO**, ensure employees receive training
Have Supervisors received Supervisor Heat-Illness Prevention Training?	☐	☐	If **NO**, ensure Supervisor receive training (contact Safety Manager)
Have employees & supervisors reviewed the BCCI Heat-Illness Prevention Program?	☐	☐	If **NO**, direct personnel to review or contact Safety Manager
WATER			
Do employees have access to enough drinking water? (at 1 qt per employee per hr.)	☐	☐	If **NO**, develop and implement procedures for providing water
COOL-DOWN AREAS AND SHADE			
Are employees who take preventative cool-down breaks monitored and asked if experiencing signs & symptoms of heat illness?	☐	☐	If **NO**, employees shall be encouraged to remain in the shade until heat illness abated
Do employees have access to shade when temperatures exceed 80°F?	☐	☐	If **NO**, develop and implement procedures to provide shade
WORK SCHEDULING AND ACCLIMAZTION			
Do Superintendents monitor weather conditions and schedule outdoor/indoor work during cooler time of the day to reduce the risk of heat illness?	☐	☐	If **NO**, Monitor Weather Reports & Forecasts; plus, schedule work appropriately
Are employees given time to acclimate to their working environment?	☐	☐	If **NO**, develop procedure to ensure employees are acclimated
Are employees observed by a Superintendent or designated representative during a heat wave?	☐	☐	If **NO**, develop and appoint personnel to observe personnel
EMERGENCY MEDICAL PROCEDURES			
If employees exhibit signs & symptoms of Heat Illness; are procedures in place to render appropriate First Aid?	☐	☐	If **NO**, develop first-aid & emergency response procedures
Are there procedures for ensuring effective communication by voice, observation, or electronic means is maintained so personnel can contact a supervisor or Local EMS?	☐	☐	If **NO**, develop effective communication procedures
Are there procedures for contacting Local EMS and/or for transporting personnel to a point where they can be reached by Local EMS?	☐	☐	If **NO**, develop procedures
Have employees been trained on these procedures?	☐	☐	If **NO**, train personnel immediately on Emergency Response Procedures

HIGH HEAT PROCEDURES (ONLY REQUIRED WHEN TEMPERATURES EXCEED 90° FAHRENHEIT)			
Question	**YES**	**NO**	**Action Required**
Do employees perform construction and loading / unloading of heavy goods?	☐	☐	If **Yes**; High Heat Procedures Implemented If **NO**; High Heat Procedures not required
Are pre-shift meetings held before commencement of work to review to review high-heat procedures, encourage employees to hydrate and remind to take cool-down rest when necessary?	☐	☐	If **NO**, conduct pre-shift meetings as necessary
Are employees monitored by implementing one or more of the following: a) Supervisor / Designated Rep for observation of 20 or fewer employees; or b) Mandatory Buddy System; or c) Regular communication with sole employee such as by radio or cellular phone	☐	☐	If **NO**, develop procedures to closely monitor employees when temperatures exceed 90° Fahrenheit
Are one or more employees at each jobsite designated as authorized to call for Local EMS?	☐	☐	If **NO**, ensure employees are designated as authorized to call Local EMS
Are employees reminded to Hydrate throughout their tour of duty?	☐	☐	If **NO**, ensure employees are reminded to Hydrate
NOTES			

ATTACHMENT C

BCCI HEAT-ILLNESS PREVENTION PLAN

The BCCI Heat Illness Prevention Program was developed to cover outdoor/indoor jobsites. Superintendents must develop a Work-Site Specific Heat Illness Prevention Plan and/or additional procedures, as needed, to ensure the Health & Safety of their employees. Personnel covered by this plan shall review and be trained on the specific procedures prior to commencing work.

Jobsite & Location:	
Completed By:	**Date:**
Access to Water	
Drinking water is provided in the form of case water and in sufficient quantities to accommodate personnel on-site for at least 1 quart per employee per hour. Sub-Contractors also provide case water for their employees. When supplies run low for BCCI and immediate call is made to the BCCI Shop and water is delivered to the site to ensure stock is replenished and full to accommodate the requirement of 1 quart per employee per hour.	
Access to Shade	
Shade is provided by building structures and trees which are readily available to employees on-site. If shade is unavailable at the jobsite; superintendents shall develop procedures for providing adequate shade and ensure they are implemented when temperatures exceed 80°F. There shall be enough shade provided to accommodate all employees during a recovery or rest period. Shade shall be located as close as practicable to the areas where employees are working.	
Acclimatization Methods and Procedures	
All employees shall be closely monitored and observed by a Superintendent or designated representative during a Heat Wave. A "HEAT WAVE" means any day in which the predicted high temperature for the day will be at least 80° F, and at least ten degrees Fahrenheit higher than the average daily high temperature in the preceding five days/ Employees who have been newly assigned to a high heat area shall be closely monitored and observed by a Superintendent or designated representative for the first 14 days of the employee's employment.	
First-Aid / Emergency Response Procedures	
If any signs or symptoms of Heat-Illness are observed or reported, immediate action shall be taken commensurate to the severity of the illness. (e.g., notification of superintendent, providing First-Aid, initiating emergency response). If the signs and symptoms are indicators of severe heat illness; emergency response procedures shall be implemented. Any employee exhibiting signs or symptoms of Heat-Illness shall be monitored and shall not be left alone or sent home without being offered Onsite First Aid and/or being provided Local Emergency Medical Services. Work-Site Radios and Cellular Service are both readily available on the jobsite. Emergency Telephones and Contacts are contained in the Health & Safety Plan (HASP) for all emergencies to include Heat-Related Illnesses.	
High-Heat Procedure (*Only Required when Temperatures Excess 90°Fahrenheit*)	
Superintendents of employees who fall under the jobsite shall develop High-Heat Procedures and ensure they are implemented when the temperature equals or exceeds 90° Fahrenheit	
NOTES:	

ATTACHMENT D

BCCI WORK-SITE SPECIFIC HEAT ILLNESS PREVENTION PLAN

BCCI Superintendents shall develop and implement a Work-Site Specific Heat Illness Prevention Plan for all BCCI jobsites not adequately covered by the BCCI Heat-Illness Prevention Plan. Employees covered by this plan shall review and be trained on the specific procedures prior to start of tour of duty.

Job Site:	Superintendent
Completed By:	Date:

How will employees be provided access to sufficient drinking water? (1 quart per employee required per hour)
☐ **Plumbed Water** ☐ **Bottled Water** ☐ **Other (Describer Below :)**
How will employees be provided access to adequate shade when temperatures exceed 80°F? ☐ **Buildings or other Manmade Structures** ☐ **Trees** ☐ **Temporary Canopy or Tarp** ☐ **Vehicle with Air Conditioning** ☐ **Other (Describe Below :)**
Acclimatization Methods and Procedures
All employees shall be monitored and observed by a Superintendent or Designated Representative during a Heat Wave. For purposes of this section only, “HEAT WAVE” means any day which the predicted high temperature for the day will be at least 80°F and at least ten degrees Fahrenheit higher than the average daily high temperature in the preceding five days. A newly assigned employee to a high heat area shall be closely monitored and observed for the first 14 days of assignment.
Emergency Medical Procedures
How will effective communication by voice, observation, or electronic means be maintained so employees at the jobsite can contact their supervision or Local EMS when necessary?
What are the procedures for contacting Local EMS and if necessary; for transporting employees to a point where they can be reached by an EMS provider?
What are the procedures for ensuring in the event of an emergency, clear and precise directions to the jobsite will be provided to emergency responders?
Who is the Designated Person who will ensure Emergency Procedures are invoked when appropriate?
High-Heat Procedures (Only Required for when Temperatures Exceed 90°F)
How will Superintendents monitor weather conditions for their jobsite and ensure High-Heat Procedures are implemented when temperatures exceed 90°F?
Who will perform the pre-shift meetings prior to the start of the tour of duty to review the High-Heat Procedures, encourage worker to Hydrate, and remind employee of their right to take cool-down period when necessary?
How will employees be monitored for alertness and signs or symptoms of Heat-Illness?

☐ Direct Supervision ☐ Buddy System ☐ Reliable Cellular Phone or Radio Contact ☐ Other (Describe Below :)
Who has been designated to call for Local EMS if needed? Who is the alternate designated caller if the primary is unavailable?
Who has been appointed to remind employees throughout their tour of duty to Hydrate?
Work-Site Specific Heat-Illness Prevention Plan Review & Training Documentation (To be completed by BCCI Employees Covered by this Plan)
I certify I have reviewed the above Heat-Illness Prevention Plan for my jobsite and have received adequate training on the implementation.

Employee Name	Employee Signature	Date Completed

8.0 FIRE PREVENTION, PROTECTION, AND HOT WORK OPERTIONS

Trades are responsible to follow the fire prevention and protection procedures when any Hot Work (e.g., burning, welding, soldering, open-flame, or spark producing) activities which are taking place, or any other conditions exist which could cause fire or smoke. Site Specific procedures are developed as required.

- BCCI will provide ABC fire extinguishers to be placed at each stair tower and distributed throughout the jobsite while being visible in corridors and at the entrance to smaller projects, or as required by local jurisdiction.

- All areas and equipment where Hot Work is anticipated is to be reviewed in detail by the subcontractor with the BCCI Superintendent, Director of Safety, or Safety Coordinator.

- Cover all voids and openings with fire resistant materials to prevent sparks/smoke from migrating and light test where possible. All protective material shall be fire resistant in occupied facilities or where a potential for fire exists.

- An ABC fire extinguisher are to be provided by the subcontractor for their own hot work, inspected monthly and annually to make sure they are fully charged and kept where they are visible and readily available.

- Trades shall always provide a fire watch person on duty during burning/welding where combustibles are present.

    - A one-hour minimum fire watch is required after Hot Work is completed. Project specific requirements may be required in addition to the one-hour minimum.

    - Each Trade is responsible to notify BCCI upon completion of the fire watch.

    - The protection will be commensurate with the hazard.

- The fire watch person is to be trained on their duties and responsibilities and are not assigned other duties. Fire watch procedures are to be reviewed with the trade after the fire watch person has been selected. The fire watch person should be on the opposite wall or floor below if spark migration is possible.

- When working in or adjacent to occupied facilities, perform the following:

    - Review the equipment involved with BCCI to establish the function, operation, and safety requirements.

    - BCCI Project Team and Safety Division to establish an emergency shutdown procedure.

    - Obtain written approval of all procedures by the Owner’s representative prior to the start of work as required.

    - Review location of air supply intakes for smoke management.

- Reference the Handling of Flammables and Combustibles in this manual.

- Smoke exhaust equipment shall be provided by the trade in occupied buildings or where otherwise required. Exhaust ducting are to be coordinated with Owner & BCCI.

- Respiratory Protection Program should be in place when respirators are required.

- Hot Work Permits are to be issued by the Chief Building Engineer or BCCI Superintendent (depending on location) and completed by the trade, especially in occupied buildings. Hot Work Permit shall be established daily.

- In some jurisdictions the Fire Code requires fire extinguishers be attached to each burning cart or outfit in addition to a fire extinguisher at the burning location.

- No open flame or spark producing activity should take place in a combustible atmosphere or where combustible vapors are present.

- Inspect fire extinguishers monthly and annually to ensure accessibility and serviceability. Monthly inspections can be completed by field staff. Annual inspections shall be conducted by a qualified inspection agency.

- Construct temporary structures within buildings, such as shanties and storage rooms, of non-combustible material, such as drywall or fire treated plywood stamped “FRT”.

- All tarps are required to use fire retardant material.

- Fire alarm systems should remain operational in renovations to notify employees when evacuation is required.

- Install a fire detection system when required by the owner or when working in occupied, historical, or otherwise sensitive buildings.

HOT WORK OPERATIONS:

Hot Work includes welding, cutting, brazing, and soldering. All Hot Work will be completed in accordance with the BCCI Hot Work Processes. This includes a daily Hot Work permit, which will be completed by the BCCI Superintendent (**Daily**) and the trade involved; in addition, Fire Watch is required once Hot Work is completed.

WELDING:

- Prior to start (weld/burn) inspect area to ensure there are NO combustible materials.
- An approved fire extinguisher (ABC) shall be at the ready at the location of welding.
- The welder MUST wear approved PPE.
- Electrical welding equipment shall meet the requirements of the National Electric Code.
- Welding on brass, bronze, galvanized iron, or cadmium plated metal; adequate ventilation must be provided.
- When ventilation is not adequate; a metal fume respirator must be worn.
- When using a local exhaust suction device; the exhaust hood must be placed within 9” inches of the fumes to be effective.
- Place and route all welding leads and hoses so as not to present a tripping hazard.

BURNING OR CUTTING:

- All valve protection cap(s) must be in place when moving/transporting cylinders and turned off when not in use.
- Cylinders WILL NEVER be lifted by the cap and be stored in an upright & secured position (an OSHA Approved Rack).
- An approved ABC type fire extinguisher shall be readily available in any location were burning or cutting is being performed.
- Appropriate PPE must be worn while burning or cutting.
- Mechanical ventilation shall be used when cutting lead, lead alloys, painted iron, or steel, lead coated iron or steel, lead bearing steels or cadmium plated metals.
- Oxygen & Acetylene cylinders must be separated by 20 feet while in storage or be divided by a one-hour fire rated divider no less than five feet in height and equipped with flash back arrestors.
- NO smoking signs shall be posted & appropriate fire extinguishers located within 75’.

HOT WORK PERMIT

BEFORE INITIATING HOT WORK, ENSURE PRECAUTIONS ARE IN PLACE! MAKE SURE AN APPROPRIATE FIRE EXTINGUISHER IS READILY AVAILABLE!

This Hot Work Permit is required for any operation involving open flames or producing heat sparks. This includes, but is not limited to: Brazing, Cutting, Grinding, Soldering, Thawing Pipe, Torch- Applied Roofing, and Cadwelding.

INSTRUCTIONS

1. Verification below is to be completed by a qualified employee (Superintendent or Labor Foreman).
2. The completed original is to be given to the BCCI Superintendent or Labor Foreman.
3. This must be submitted 24 hours before work is started

Hot Work Being Completed By

TRADE

DATE: Start Time: ☐ am ☐ pm

Location / Building / Floor

Nature of Job / Object

Name(s) of Person(s) Doing Hot Work

Hot Work Stop Time: ☐ a m ☐ p m

Signature:

I verify the above location has been examined, the pre-cautions checked on the Required Precautions Checklist have been taken to prevent fire, & permission is authorized for this work.

Superintendent Signature

Permit Expires
Date:

Time ☐ AM ☐ PM

Fire Detection ☐ Disabled ☐ Re-Activated

Date: Time: ☐ am ☐ pm

Date: Time: ☐ am ☐ pm

Signature:

THIS PERMIT IS GOOD FOR ONE DAY ONLY

REQUIRED PRECAUTIONS CHECKLIST

☐ Automatic Fire Detection Disabled?
☐ Available sprinklers, hose streams, & extinguishers are in service or operable?
☐ Hot work equipment is in good repair?

Requirements Within 10m (25ft) of Work

☐ Flammable liquids, dust, lint, & oil deposits removed?
☐ Has Sub provided own Fire Extinguisher for work?
☐ Are Floors swept and clean?
☐ Combustible floors wet down, covered with damp sand or fire-resistant sheets? (Remove other combustibles where possible.)
☐ Is protection with fire-resistant tarpaulins or metal sheets?
☐ Are all wall and floor openings covered?
☐ Fire-resistant tarpaulins suspended beneath work?

Work on Walls or Ceilings/Enclosed Equipment

☐ Is construction of non-combustible & without combustible covering or insulation?
☐ Have combustibles been moved away?
☐ Does danger condition of heat exist in another area?
☐ Enclosed equipment cleaned of all combustibles?
☐ Containers purged of flammable liquids/vapors?

Fire Watch / Hot Work Area Monitoring

☐ Fire watch will be provided during and for 1 Hour after work, including any coffee or lunch breaks?
☐ Fire watch is supplied with suitable extinguishers.
☐ Is Fire watch is trained in use of this equipment and in sounding alarm?
☐ Fire watch may be required for adjoining areas, above and below.
☐ Monitor Hot Work area for 4 hours after job is completed.

Other Precautions Taken

☐ Confined space entry permit required?
☐ Is Area protected with smoke or heat detection?
☐ Ample ventilation to remove smoke/vapor from work area?
☐ Is Lockout/tagout required?

FIRE WATCH DUTIES:

- Be sure you have a Hot Work Permit before beginning any activity which could cause a fire or smoke incident. Coordinate with Project Superintendent in advance of burning, welding, cutting, brazing, soldering, grinding, etc.
- A fire watch is required in or adjacent to occupied, completed, or historical buildings where any spark producing, or open flame activity could result in a fire or smoke incident.
- A fire watch should be sure to look at each level a spark which might land before the hot work activity begins and take measures to prevent sparks from spreading. Use fire rated blankets, seal all areas, and wet down or mist in advance if possible.
- Be sure to look for air intakes to ensure smoke will not enter an occupied building.
- A properly rated fire extinguisher should be readily available on each level where a spark could ignite a fire.

- When the burning or welding begins, stand in a location where you can see sparks on multiple levels, or at the lowest level. Be sure the sparks do not continue down crevices or burn through tarps to lower elevations.
- The appointed fire watch person should have a radio or telephone to contact their foreman and BCCI personnel immediately in the event of a fire.
- Should smoke occur or small fires erupt, the fire watch should make an immediate effort to extinguish the fire while it is small or smoldering. Once fire spreads, radio, or telephone the Superintendent and notify others to leave the area immediately.
- Train Fire Watch in the use of fire extinguishers, site-specific requirements, such as the closest Fire Alarm Pull Station.
- Fire watch will continue after the completion of Hot Work for a minimum of one (1) hour or as designed by building or local jurisdiction.

FIRE WATCH LOG:

Project Under Fire Watch:
Persons Performing Fire Watch:
I have the instructions about performing Fire Watch and Understand I am responsible to follow all instructions and training while patrolling my designated sector or area at least every half-hour. Signature:

Date	Time	AM	PM	Area-Sector

FIRE PROTECTION:

Fire Sprinkler Protection is an important method during construction and there are means and methods to assist with the protection in the event of an accidental discharge of the Fire Sprinkler System.

Sprinkler Remediation Kits are delivered to the jobsite and strategically placed throughout the project to ensure coverage and mission readiness. The Sprinkler Remediation Kit contains the following items:

- One (1) – 55 Gallon plastic garbage can with a snap lid on wheels; there are four (4) inch holes cut into the center of the lid, which is to accommodate a four (4) inch PVC pipe.

- One (1) – Four (4) inch PVC pipe; the length and fittings are determined by ceiling height & sprinkler type.

- Eight (8) – Bags of sawdust on wheels (furniture dolly) for mobility.

NOTE: Remediation Kits are dependent on Project Size (e.g., 1 kit per 3.5 square feet)

Another method of prevention method for the protection of the Fire Sprinkler System are Sprinkler Cages are installed prior to any demolition and are kept in place until the new heads have been installed.

Directional Signage for the Fire Sprinkler Shut-Off Valve is posted throughout the project which provides directions directly to the valve. Once at the valve there is signage placed at the valves providing which valve to shut-off first and what direction to turn the valve.

In the event the shut-off valve is located at an elevated height; a ladder will be chained to the riser as insurance the ladder will NOT affect the means of egress from the facility. Due to many different types of facilities; there are instances where the building has chained the valves in the OPEN position; however, bolt cutters will be chained in the area. All these steps are coordinated and installed with the approval of the chief building engineer.

Training is conducted on the use of this system through a “Dry Run.” This has been a proven successful program. During several different phases of the project a “Dry Run” is conducted to ensure each worker walks through the shut-off procedure and understands not only the process; but, where the locations of the valves are located, and which valves are to be turned off/on and in which order.

The Superintendent is highly encouraged to ensure this item is covered in the weekly safety meetings and Foreman’s meetings. During this topic coverage, the Superintendent is required to ensure these Sprinkler Remediation Kits remain mission ready and in position for immediate use in the event of an accidental discharge. This is performed through weekly safety inspection of the jobsite.

Fire Extinguishers are provided and stationed one every 75 feet per Cal-OSHA requirements. Additionally, Fire Extinguishers are provided for Fire Protection and are NOT to be used for HOT WORK PERMIT Operations; each sub is required to provide their own extinguisher.

FIRE SPRINKLER PROTOCOL:

SPRINKLER REMEDIATION KITS

The sprinkler remediation kits are delivered to every new project and include:

- One (1) - 55-Gal plastic garbage can with a snap on lid & wheels. 4" hole cut in the center to accommodate 4" PVC pipe
- One (1) - 4" PVC pipe. Length & fittings determined by ceiling height &sprinkler type.
- Eight (8) - bags of sawdust. Sawdust stored on wheeled furniture dolly.

NOTE: The number of water remediation kits is dependent on project size.

PREVENTION

Sprinkler Cages are installed prior to demolition & remain in place until new heads installed.

TRAINING

- Dry Runs
    - Dry Runs are conducted at various stages of the project to ensure all personnel walks through the shut-off process, and understands where the valves are located, which valves to turn-off and on, and in which order.
    - Superintendents are encouraged to personally walk all personnel through the process; however, this can be delegated to the Labor Foreman.
- Safety Meetings
    - Repetition is our companion; Superintendents are recommended to cover at every safety meeting.

NOTE: Excerpt from Safety Meeting Notes:
Sprinkler Protocol

- ***DO NOT Hit the Sprinkler Heads***
- ***If a Head is broken, everyone shall assist with the response***
- ***Sprinkler Barrels & sawdust are located throughout the floor***
- ***Valves are in the stairwells – Typical for High-Rise Buildings***
- ***If you hit a sprinkler head and it does NOT release; Inform BCCI Superintendent or Labor Foreman so it can be inspected for damage***

SUPERINTENDENT AND LABORER's MEETING

- Sprinkler Head incidents are discussed at each Superintendent & Laborer's Meeting
    - Accolades from various Building Managers are shared with the group when our protocols and preventative measures, mitigation, and rapid response during an emergency.

SIGNAGE

- Directional Signage is installed throughout the project to direct staff to shut-off valves.
- Laminated Signs are attached on shut-off and drain valves.
- Signage shows which direction to turn the valve and which valve to address first.
- This have proven to be extremely effective in an emergency scenario.

MISCELLANEOUS

- If shut-off valves cannot be reached, chain a ladder to the riser.
    - Ensure ladder does not interfere with the stairwell means of egress.
- Buildings do chain the valves in the OPEN position and if this is observed.
    - Chain bolt-cutters in the area.
- All the above sub-bullets are approved pending permission from the Chief Building Engineer.

NOTE: There is a product called Sprinkler Shunt Gun. This device closes off the sprinkler in the event of a break. BCCI does possess several of these devices at our warehouse.

DEMOLITION, SPRINKLER MEETING, CHECKLIST

Date:	Project No.:
Project Name:	Laborer Foreman:
Project Address:	Superintendent:

Completed	Points to Cover with ALL Laborers & Personnel prior to starting any work
	Meet with all personnel prior to starting any work
	Discuss the work which will be performed & awareness of sprinkler heads
	Show personnel location of the sprinkler shut-off valves
	Ensure personnel know if sprinkler valves will remain ON or OFF during shift
	Show personnel location of sprinkler barrels and sawdust
	Explain differences during an emergency when valves are ON or OFF
	Explain how to physically shut-off valves & rain the systems if valves remain ON
	Have a plan on who is responsible for what in the event of an emergency
	Sprinkler Valves will Remain ☐ ON or ☐ Off on this project

Trade	Employee Signature

Comments or Notes

9.0 DEMOLITION, PLUMBING, PIPING, AND ELECTRICAL SAFE-OFF PROCEDURES

DEMOLITION

- Conduct a pre-planning meeting to review the assessment and engineering survey.
- Prior to the start of demolition, an assessment must be performed to determine occupational health hazards, structural stability issues, environmental, utilities, fire, and explosions potentials.
- Demolition of major structural members requires a written engineering survey by a registered professional engineer. The engineering survey must include building characteristics, shoring requirements, and demolition sequencing method of procedures.
- Adjacent buildings / structures directly affected must be included in the engineering survey.
- Identify all utilities, underground, overhead, and protect prior to the start of demolition.
- Any utilities which are going to be abandoned must be physically disconnected at both ends prior to start of demolition.
- Pedestrian & road traffic must be redirected, protected, or restricted prior to demolition.
- During demolition, any environmental issues arise, contact Director of Safety and Superintendent immediately.
- Maintain access and means of egress throughout the demolition.
- During demolition all fire suppression system and heads will have Yellow Caution affixed to warn other personnel of this system.
- A color-coding system must be determined when mechanical, electrical, plumbing, nurse call, pneumatic tube systems, telephone or data, or structural components (e.g., walls, ceilings, etc.) will remain or be demolished. (Green or Red).
    - Green = Indicates items can be demolished.
    - Red = Stop Indicates items cannot be demolished.
    - NO Paint = Items are NOT to be demolished or have NOT been cleared.

NOTE: Mandatory PPE includes 100%, Hard Hats, Safety Glasses & Goggles, Cut Resistant Gloves, and Kevlar Sleeves. Depending on the task to be performed additional PPE will be identified and required for demolition.

DEMOLITION CHECKLIST AND PROCEDUES

GOALS

- To have as many “EYES” as possible looking out for the safety or all personnel onsite.
- To establish checks ensuring worker safety & reduce risk of interrupting building systems.

FOUR (4) CHECK SYSTEM

- Superintendent is responsible for the scheduling of safe-off with the Chief Building Engineer and appropriate MEP Trades.
- Superintendent is responsible to clearly identify and communicate the demolition and safe-off scopes to all trades.
    - The demolition sub-contractor is responsible to arrange their foreman onsite during the demolition process to walk the site with the Superintendent prior to start.
    - If the sub-contractor foreman who walked the site is NOT available during demolition, then the project will be stopped until their arrival.
- The electrical trade is responsible to safe-off ALL energized circuits to include the life-safety circuits in the walls being demolished. No wall will be demolished containing an energized circuit, switch, strobe, or outlet.
    - The electrical trade must “verify all devices” are “dead” using a circuit tester.
    - Safe-off for ceiling demolition may require emergency circuits to remain “live”.
    - All “HOT” conduits will be clearly identified with “Red Danger” Tap at every 6’ feet of the run and all “Junction boxes” with energized circuits will be covered.
    - All safe-off of electrical shall be physically disconnects (divorced) at each end by the electrical trade prior to demolition start.
    - All “live” circuits will be identified & communicated to Superintendent prior to start.
- BCCI Demolition crew performing demolition will use a circuit tester to confirm all devices are “dead” prior to start of demolition.
- Demolition sub-contractors are to assume all devise & conduits are “hot” prior to start.
    - They are to use circuit testers to verify outlets are de-energized prior to start of demo
    - Demolition will NOT take place containing an energized circuit.
    - Demolition sub-contractors are responsible to layout demolition.

- Superintendent must walk with demo crew to confirm layout.

WORKING WITH ENGERGIZED CIRCUITS

- Electrical Systems shall Never by performed while circuits are energized.
- Electrical trade is required to adhere to their published Lock-Out / Tag-Out process.
- Accessing an energized junction box shall be performed by an experienced qualified electrician, preferably a foreman or above.
- The foreman shall decide to disturb the wires only if the junction box is not overly full of wires and all connections can be seen and are safely attached.
- If the foreman is not confident the wires can be adjusted without incident, the circuit must be de-energized prior to proceeding.

Sub-Contractor	Name (Printed)	Date
BCCI Superintendent		Date

PLUMBING & PIPING SAFE-OFF PROCEDURES

Sub-Contractors providing any work, pertaining in any way to plumbing or piping systems, components, equipment, or any other systems related to the project; then those trades shall be responsible during their scope of work for the compliance and following of the BCCI Plumbing and Piping Safe-Off procedures. These procedures are outlined below:

- Prior to commencement of work, the trade MUST have and submit all Safety Data Sheets (SDSs) of all chemical solvents, etc., to be utilized in this scope of work.
- Plumbing & Piping Safe-off is to be accomplished; then a validation and verification inspection via a visual physical separation and containment “cut and cap” of all plumbing and piping.
- Once completed the trade notifies BCCI Project Team to confirm the “cut and cap”.
- Any plumbing or piping affixed to a wall, ceiling, structure, etc. which is to be demolished or partially demolished, the systems “will” be cut and capped outside of the items to be demolished or partially demolished.
    - In NO way shall the “cut and capped” item(s) still be attached to the system which is scheduled for demolition or partial demolition.
- All Caps WILL be fully installed and have the capability of holding normal operating temperature and pressure indefinitely of whichever system.
- Any leaks: manpower and materials are to promptly contain the leak and remediate any damage caused by the leak, because of an improper “cut and capped” system Will be the sole financial responsibility of the plumbing or piping trade which is assigned this scope of work.
    - A Certified Industrial Hygienist MUST be contacted and scheduled ensuring they test all areas affected by the leak.
    - This a pre-cautionary measure to assess and evaluate the area for mold growth mitigation.
- All trades will work with the BCCI Project Team to procure the proper Hot Work Permit, and supply their own protection equipment (e.g., fire extinguisher, fire resistant PPE, etc.) and ensure these items are compliant, current, and free of defects or damage.
- All trades are responsible of clearing all debris and material at the completion of this task, ensuring there are NO hazards which could lead to a mishap or exposure.
- Ensure all residual water is cleaned-up prior to departure as to aid in the prevention of slips, trips, or falls.
- All trades MUST ensure the area is secured to prevent personnel from entering a controlled area inadvertently, which mitigates the risk of injury or mishap.

- BCCI is responsible and discretion to properly and promptly respond to any leak incident while directing the necessary manpower (regular or overtime), demolition, abatement, materials, and installation to render the areas safe which were adversely affected due to the leak.

- Any component failure: the BCCI Director of Safety MUST be contacted and respond, evaluate, provide guidance while investigating the incident.

Sub-Contractor	Name (Printed)	Date
BCCI Superintendent		

10.0 HAZARDOUS ENERGY (LOCK-OUT/TAG-OUT) AWARENESS PROGRAM

What is Lockout/Tagout (LOTO)? Specific practices and procedures to safeguard employees from the unexpected energization or startup of machinery and equipment, or the release of hazardous energy during service or maintenance activities. This is a program which requires hazardous energy sources to be “Isolated and Rendered Inoperative” prior to the work being started on any equipment in question.

This section is designed to aid in the coaching, mentoring, and education on the importance of this program and to recognize elements of the program, while understanding the implications which can be incurred if this program is not followed and protecting all personnel from hazardous energy.

- Lockout/Tagout is an OSHA Standard which requires the blocking of existing systems, to which may cause damage, injury, or death, using of locks and tags.
- The appropriate trade is responsible to establish and maintain a project specific lockout/tagout program related to their scope of work involving systems which contain harmful energy (e.g., electrical, mechanical, elevator and escalator systems).
- A pre-planning meeting must occur between the trades affected and the onsite Superintendent which shall include the building engineer to address all risks.
- All affected trades shall notify the onsite Superintendent of all shut down and start up for all MEP equipment.
- Use of locks along with tags identify the person(s) as the primary means of impairment.
    - Trade foreman will validate and verify impairment.
    - Building Engineer, Trade, and onsite Superintendent will validate and verify completion of work; then remove all locks and tags.
- Any personnel performing maintenance or service on hazardous energy equipment must by an authorized agent and trained on the site-specific requirements set by the trade.
- A log of all lockout/tagout will be maintained onsite by the responsible trade.
- When one or more trades are onsite, only one is responsible for the lockout/tagout and the energization and turning on of circuits or services.
    - This must be coordinated with Project Team, Superintendent, Trades, and Building Engineer.
- All personnel affected by lockout/tagout will be trained the procedures set in place by the responsible trade.

GENERAL REQUIREMENTS

- The General Foreman or Foreman assigned to the project shall determine all potential sources of equipment or building services prior to the start of work.
- Then de-energize the equipment or building service from all energy systems (sources) from the determination of the identified list.
- Physically secure the device(s) utilized to de-energize the equipment or service which shall be in the “Safe” Position and a Danger Tag and Locked affixed.
- Check the equipment or service to validate and verify “Zero Energy State.” This is accomplished using a Voltage Meter while in NFPA 70E Protection Suits.
- Equipment will never be re-energized until all affected personnel are notified and have cleared the area, and the system has been checked out by a Qualified Person.

NOTE: Energy source(s) are defined by OSHA to include all electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy source(s) which can cause injury, damage, or death to personnel.

SPECIFIC REQUIREMENTS

Prior to commencing any Hazardous Energy work related to any scope; they must coordination with all appropriate parties (e.g., Chief Building Engineer, Client, BCCI Project Team, and BCCI Director of Safety). After coordination will require the trade and BCCI to submit a Method of Operating Procedure (MOP) to BCCI Director of Safety for Approval and the Chief Building Engineer (*Refer Section 22.0 Electrical Safety for more details*).

The affected trade shall give due consideration to their scope of work and ensure all potential energy sources within the area of work is validated and verified by a “Qualified Person.” The Qualified Person must give special attention to the following:

- Multiple Hazardous Energy Sources
- Any Residual Energy within the Sources
- Remote Start-Up of the Identified Equipment

DE-ENERGIZATION & LOCKOUT/TAGOUT

- ELECTRICAL:
    - All Service disconnect switches to the equipment & line will be in the OPEN (OFF) position and locked to prevent accidental engagement.
    - Once lock installed ensure a Danger Tag affixed to the lock. Ensure the date and signature of the supervisor requesting the lockout/tagout.

- When multiple trades are working on the same piece of equipment, the supervisor of each trade must apply their own lockout/tagout.
    - Then a multiple lockout device will be utilized
- The keys to the locks shall be maintained and safe possession of the individual who applied the lock.
- A combination lock cannot be used as a means of lockout/tagout.

- MECHANICAL
    - Any powered pump which are electronically controlled, all valve and control devices where the work is to be performed MUST be placed in a Safe Condition, then lockout/tagout MUST be applied identical to the Electrical lockout/tagout.
    - Mechanical Isolating Devices WILL be utilized.
    - When valves and controls have been placed in a Safe Condition a lockout/tagout WILL be applied.
    - Slip Blinds("pancakes") may be required on systems without mechanical valves.
    - When multiple trades are working on the same piece of equipment, the supervisor of each trade must apply their own lockout/tagout.
    - A Competent Person is to ensure a "Zero Energy State" WILL check the systems and equipment for which the work is being performed on.
    - All mechanical systems & equipment are to be drained prior to penetration.
    - Systems which do not contain corrosive, toxic, or flammable substances MUST be drained and purged prior to work beginning.

NOTE: CAUTION = All equipment to be lockout/tagout is considered energized until ZERO VOLTAGE can be validated and verified. This requires the use of NFPA 70E Personal Protective Equipment (appropriate Category Hot Suit).

RELEASE FROM LOCKOUT/TAGOUT

NO system (electrical or mechanical) shall be released from lockout/tagout until all inspections are completed, then locks, tags, and devices are removed by an authorized employee of the respective trade.

NOTE: CAUTION = A Competent Person shall validate and verify the system is energized. This requires the use of NFPA 70E Personal Protective Equipment (appropriate Category Hot Suit).

11.0 CONFINED SPACE AWARENESS

The information contained herein is to provide BCCI Personnel with awareness information and training concerning Confined Spaces. Our target audience are personnel who work around spaces (e.g., tanks, manholes, vaults, etc.); however, are NOT Authorized to enter. These spaces may contain hazardous atmospheres or hazards which must be controlled or eliminated prior to entry. The purpose of this awareness is to ensure personnel can identify a confined space within their work environment.

What is a Confined Space?

A Confined Space as defined by OSHA is a space large enough and so configured an employee can bodily enter and perform assigned work. This space also has limited or restricted means for entry and exit (e.g., tanks, vessels, silos, storage bins, hoppers, vaults, fuel cells, and pits) which have limited means of entry, and is NOT designated for human occupancy.

What types of Confined Spaces are there?

There are three (3) main types of Confined Spaces:

1. Permit Required – one or more of the following characteristics must be present

    a. Contains or has a potential to contain a hazardous atmosphere

    b. Contains a material which has the potential for engulfment

    c. Has an internal configuration to trap or asphyxiate and entrant worker

    d. Contains any other recognized serious safety or health hazard

2. Alternate Procedure – a procedure which may be used to enter a Confined Space if the only hazard present is atmospheric in nature

3. Non-Permit Required – a space which does not contain with respect to atmospheric hazards, but have potential to cause death or serious injury:

    a. Oxygen deficient = less than 19.5% oxygen (O^2) by volume

    b. Oxygen enriched = more than 23.5% oxygen (O^2) by volume

Since we now know what three (3) types of Confined Spaces are, personnel must understand the three (3) criteria which defines a Confined Space, and the identified space must meet all three (3) of the following criteria. The criteria are as follows; limited openings for entry and exit, space not intended for continuous human occupancy, and large enough to enter and conduct work.

All Confined Space have hazards associate with the space itself and with scope of work being performed while producing hazards. Personnel need to know what is and what is in the Confined Space as the risks within a Confined Space are dangerous and with a lack of knowledge plus respect equals disaster or death.

What are some of the most common hazards identified within a Confined Space?

- Hazardous Gases and Vapors (e.g., carbon monoxide, carbon dioxide, freon, etc.)
- Asphyxiation due to limited oxygen
- Combustible dusts, flammable liquid, or gases
- Explosion, Engulfment, Fall Hazards, trapped, or Rescuer Death

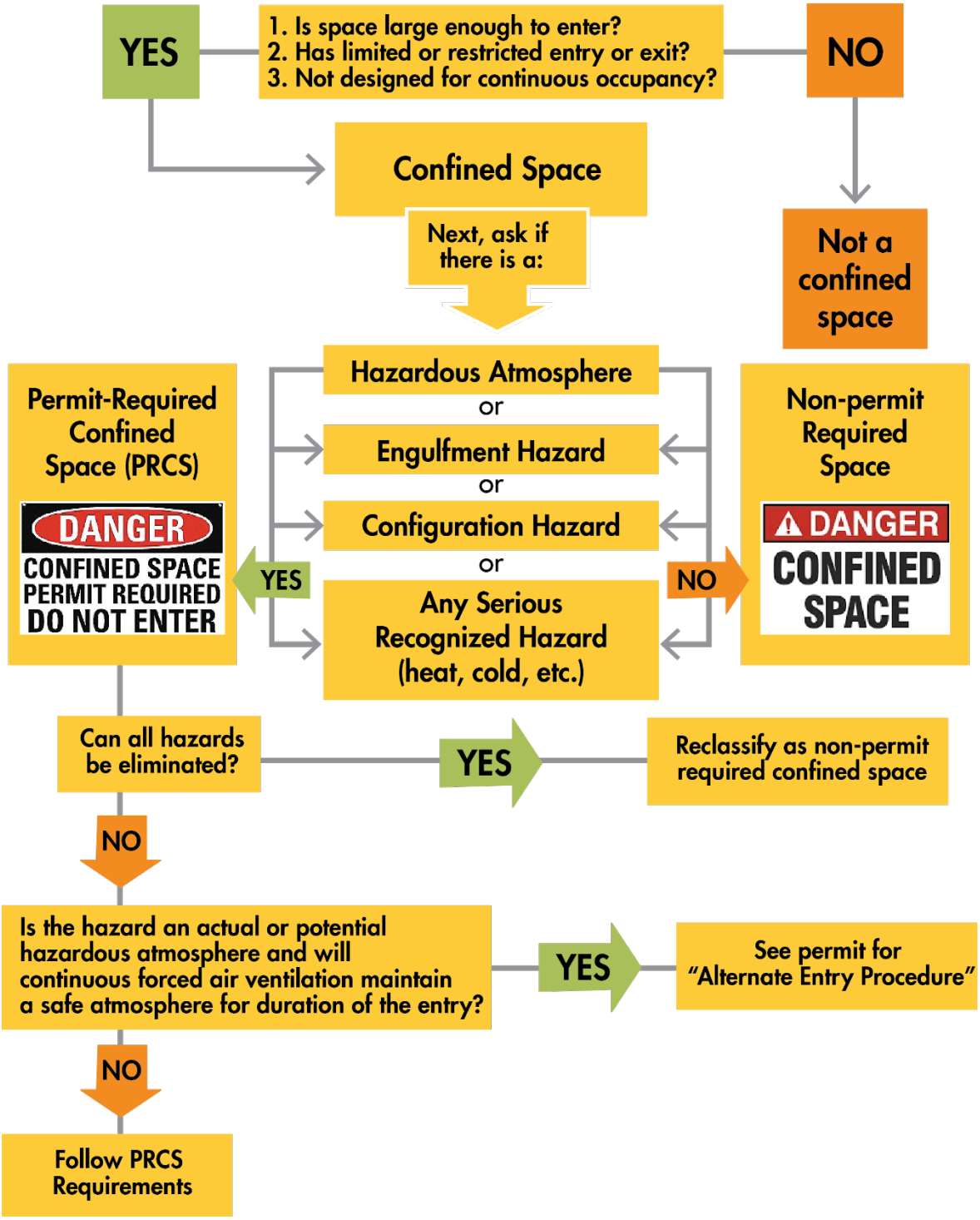
The above listed items are considered are the biggest dangers to personnel as any exposure will expose personnel to the risk of death, injury, acute illness, incapacitation, or reduce their ability to escape unaided. A hazardous atmosphere can be caused by flammable or combustible materials within the space or air, can be introduced due to the scope of work (e.g., welding), there is too much or too little oxygen in the air, or chemical substances in the air as well.

Atmospheres can be classified as dangerous or immediately dangerous to life and health (IDLH). The atmosphere and the dangerous conditions are heightened due to their conditions and limited means of escape or egress. To lessen the likelihood of injury and death in the Confined Space personnel need to be prepared and follow procedures and processes. As stated in the beginning, this is only awareness to provide education of what a Confined Space is and how to identify these areas. We also are coaching and mentoring personnel to protect themselves and the team.

BCCI Construction, LLC is a General Contractor and is now equipped or to perform confined space work and this scope with be sub-contracted out; however, BCCI will ensure the sub-contract is let to a company who is certified, has a Master Entry Program (MEP), trained and certified personnel.

BCCI Construction, LLC have been instructed even with this awareness training to contact the BCCI Director of Safety and request immediate assistance to understand scope and aide in the identification of a Confined Space. Additionally, the Director of Safety will provide the Project Team and others the guidance of a Confined Space Program. The goal is to for the Project Team to ensure the Safety Division is included on site walks to identify early any or potential issues with Confined Spaces being discovered on the project.

CONFINED SPACE IDENTIFICATION FLOW CHART



12.0 ASBESTOS, LEAD, MOLD AWARENESS & TESTING PROCESS

The following information is being assembled to provide guidance and processes to various forms related to Environmental Hazards discovered during construction or demolition on a project. BCCI Construction, LLC has developed and implemented a process and flow-chart for use by the Estimators, Project, and Field Teams.

Once a project is awarded, the estimators and project team MUST immediately engage with the building or client to request a current Hazardous Survey Report, which is a report identifying any form of Asbestos (ACM), Lead, Mold, and other hazardous substances which may pose as an exposure risk to personnel, trades, client, architects, and others. In addition, a soils report shall be requested (if there is excavation and trenching on the project) and the purpose of the report is to determine if there are any Volatile Organic Compounds (VOCs) within the soils which can expose our personnel and trades.

The purpose of these reports is aid BCCI Construction, LLC to understand what hazardous substances could be onsite and be exposed to personnel. Additionally, the reports provided may be outdated or a visual inspection versus actual testing and will require BCCI to have the site re-tested. Once results are received, BCCI uses this information to ensure personnel are informed, trained, and all required Personal Protective Equipment (additional) is on-hand and used to protect everyone, as well as the use is to ensure proper abatement is conducted and scheduled.

It is the policy of BCCI Construction, LLC to ensure everywhere we touch, demo, etc. is tested and if an unknown substance is discovered during any phase the work is stopped in this area and our Certified Industrial Hygienist is contracted to perform additional sampling and testing.

Our process consists of:

- An Initial Hazardous Survey SHALL be conducted and reviewed during the Pre-Bid Phase of the project.
- An assessment SHALL be performed by our Certified Industrial Hygienist (CIH) which they will sample and test to identify the anticipated Environmental Hazards of the project.
- The BCCI Director of Safety will be informed from the beginning and notified immediately of the results so the development of the work plan for the project can completed in conjunction with the CIH.
- The work plan for the specific project MUST at a minimum
    - Site Survey Data, Identification of Hazardous Areas, Actual Written Work Plan.
    - Procedures for Personnel who encounter newly identified suspicious substances.
    - Procedures for Personnel NOT involved with identified suspicious substances.
    - Training of Personnel will receive, and Information is communicated to all personnel.

- During the weekly safety meeting with project personnel, (e.g., project team, trades, client, architects, etc.) communicating the hazards, abatement process, and processes for suspicious hazards. Open Communication is a MUST.

- Ensure all documentation of the identified hazards related to environmental issues or concerns is thoroughly documented and memorialized for lessons learned and future referencing. Every project site is unique, and each work plan will be adjusted accordingly to the reflect the status of the results and substances tested.

ASEBESTOS CONTINAING MATERIAL (ACM) – LEAD – MOLD

Request Hazardous Survey from Facility (Property Management or Chief Building Engineer)

Bay Area and South Coast Air Quality Management Districts Regulations enforce the U.S. EPA Standards or Regulations on Asbestos and does NOT have an end date when the facility was built, as a NEW Facility MUST comply with the same requirements as the older facilities.

- Once BCCI receives the Hazardous Survey, this MUST be reviewed by the Director of Safety, Safety Coordinator, Field Operations Manager, Project Manager, and Superintendent) to ensure all items we (BCCI) are going to touch, attach, demolish, or disturbing has been tested and is free of any substances which expose our personnel.

- If any areas we will be touching, attaching to, demolishing, or disturbing have NOT been tested; these items will be required to be tested prior to start of work.

- Any abatement MUST be coordinated as needed through property management and their preferred abatement contractor and hygienist of record. The work plan MUST be developed by CIH of record and strictly adhered to by abatement contractor.

- If the property management does NOT want to abate identified items, then BCCI may offer those services at a cost through one of our abatement contractors. Consult with the building to ascertain if the CIH of Record will provide the work plan or if we need to engage and hire our CIH to provide the work plan.

- Upon completion of abatement, we MUST receive a clearance report from the CIH of Record or BCCI CIH, which is allowing BCCI to work within the abated space.

- If a Hazardous Survey is NOT received, BCCI will request the building to test everything we are touching, disturbing, attaching to, and demolishing. If building does NOT want to test, then will engage our CIH (EnviroNova) and provide all the plans to them.

- Once results are received, coordinate with property management and owner. If abatement is approved, EnviroNova will need to provide the work plan. If the abatement is awarded, EnviroNova will become the CIH of Record and will issue the Clearance Report to proceed with construction.

NOTE: Many of the activities of sampling, analysis, and testing could and will impact the schedule, which causes delays. This process will carry a cost and shall be coordinated with our CIH on the turnaround time needed to continue construction.


BAAQMD regulations enforces US EPA rules on Asbestos and does not have an end date on when a building was built, a new building must comply with these requirements
HAZ-MAT REPORT
YES
NO
NO HAZ-MAT REPORT
Ensure Report is SEEN by Safety Manager, FOM, Estimator, & Superintendent
If materials HAVE NOT been tested (everything we touch, disturb, or attach to) MUST be tested prior to starting work
Coordinate Abatement as Needed with Building, Preferred Contractor, and On Record Hygienist
The Certified Hygienist On-Record MUST provide a work plan which MUST be followed by the Abatement Contractor
If Building DOES NOT want to Abate:
BCCI Can Offer Services at Cost through our Sub-Contractors
NOTE: Check w/Hygienist On-Record if they will provide work plan?
If NOT; we will need to hire our own Hygienist to develop Work Plan.
Once Space is Abated; CLEARANCE REPORT REQUIRED from Hygienist before we can proceed with work
NO Haz-Mat Report – Request Building to Test Everything we will touch, disturb, or attach to
If Building DOES NOT perform testing
Contact EnviroNova (415) 883-7575
Send Plans & Have them Walk Space and conduct necessary testing
Once Results Received; Discuss Areas Needing Abatement with Owner
Owner Wants BCCI to Abate; Work Plan Required from EnviroNova for Certified Abatement Contractor
Once Work Plan & Pricing Received; Submit!
If Awarded; EnviroNova will be Hygienist of Record
Once Space is Abated; CLEARNACE REPORT REQUIRED from Hygienist before work can be performed

ENVIRONMENTAL ISSUE/CONCERN	LOCATION	ONCE DISCOVERED / SUSPECTED
Asbestos (ACM): Friable or Non-Friable	Pipe & Boiler Insulation / Gaskets Ceiling & Floor Tiles Sheet Rock & Wall Shingles Exterior Roof Material Trowel-On Surfacing (Fireproofing / Plaster Materials) Unknown Fire Materials Transite Material **Found in Most Buildings Built (1970-1972) **	- Prior to Work Request to Review the Hazardous Materials Report -If Material is Accidentally Disturbed, ***STOP*** Work Immediately & Isolate Area -Notify Superintendent & Director of Safety -Contact Hygienist of Record or Refer to BCCI Haz-Mat Report Flow Chart -If ACM is Confirmed; Hygienist Develops a Work Plan & Follow all Cal-OSHA, EPA, State, & Local Regulations
Lead Containing Paint:	Painted Surfaces Interior or Exterior Lead-Acid Batteries Lead-Lined Sheet Rock ***Banned from Paint Products in 1978***	-Prior to Work Request to Review the Hazardous Material Report -All Materials Suspected Contact Hygienist of Record or Refer to BCCI Haz-Mat Report Flow Chart -If Confirmed; Hygienist Develops a Work Plan & Follow Cal-OSHA Guidelines of Trigger Tasks for Lead & Disposal -Notify Superintendent & Director of Safety
Mercury:	Thermometers Thermostats Mercury Vapor Lamps Fluorescent Light Bulbs	-If Located Notify Superintendent & Director of Safety -Suspected or Confirmed Mercury Must be Handled & Disposed IAW Local, State, & Federal Regulations -Fixture Suspected or Confirmed Must be Removed Intact & Stored in an Approved Waste Collection Container for Disposal - For Spill Clean-Up Procedures – Contact BCCI Director of Safety & Consult Facility Engineer

Mold: Renovation Projects	Area Where Moisture is Present from Leaks Sheet Rock Insulation Fire Proofing Material Porous Organic Material (Paper, Wood, Rugs)	-Identify & Barricade Area; then Notify Superintendent & Director of Safety -Consult Certified Hygienist and Perform Testing -If confirmed, Follow Work Plan and all Materials Shall be Removed -Disposal is Conducted IAW all Local, Cal-OSHA, EPA, & Federal Guidelines
Mold: New Construction	Found on Projects which are not watertight Project Not Watertight Sheet Rock Insulation Ceiling Tile Fire Proofing Material Porous Organic Material (Paper, Wood, Rugs)	-Ensure Project is Watertight Prior to Starting Drywall & Insulation -If unable to Ensure Project is Watertight; Develop Work Plan to keep Supplies & Materials off floor & Covered - Verification if New Facility is Free of Mold; Consult Certified Industrial Hygienist of Record for testing
PCB's: (Polychlorinated Biphenyls)	Chemicals Used Cooling Agents in Electronic Transformers & Light Ballasts Common Names (Aroclor, Askarel, Elemex, Inerteen, Chlorextol, Pyranol) ***Production Halted in 1977***	-If Located Notify Superintendent & Director of Safety -Ballasts & Transformers Must be Handled & Disposed of per Local, State, Cal-OSHA & Federal Regulations -For Spill Clean-Up Procedures – Contact BCCI Director of Safety & Consult Facility Engineer
Respirable Crystalline Silica:	Demolition Excavation Cutting or Coring Concrete Products Cutting or Coring Stone & Marble Products	-Dust must be Controlled by Using the Wet Method -If Wet Method Cannot be Used; Consult with Director of Safety & Superintendent -Review OSHA Table 1 for Alternative Methods -Consider Areas When Setting Up

Drums: **Tanks**:	Storage of: Fuel, Oils, Gasoline, Acids, Toxic Chemicals, etc.	-All Tanks or Drums NOT Associated with Construction Activities Shall be Removed by a Certified Sub-Contractor IAW all Cal-OSHA, EPA, & Local Standards -If Found During Construction All Work ***STOPS*** -Notify Superintendent, Director of Safety & Contact Environmental Consultant
Contaminated Soils: (e.g., PCBs, Volatile Organic Compounds, Metal, Lead, Mercury & Arsenic)	Soils Surrounding Underground Tanks Ground Surface Infiltration: (Chemicals, Oil Spills, Infectious Waste) Sand Waste Used to Remove Lead Containing Paint	-During Excavation -Soils Show Contamination All Work ***STOPS*** -Soils Shall be Tested for Confirmation for Substance -Develop Work Plan & Personnel Trained -If confirmed; Contaminated Soils Must be Properly Handled & Disposed of IAW all Federal, Cal-OSAH, & Local Regulations
Sewage:	Existing Building Piping System Excavation with Unknown or Unexpected Sanitary Sewer	-Ensure Pre-Cautions are Developed & Enacted to Prevent Exposure to Raw Sewage -During Excavation; Works Immediately ***STOPS*** -Notify Superintendent & Director of Safety -If Personnel are Exposed; Enact Bloodborne Pathogen Program and Offer Hepatitis B Vaccination

NOTE: This Table is a listing of Environmental Hazards discovered on a project site. This Table is for REFRENCE ONLY. Questions relating to this Table or Environmental Questions SHALL be directed to the BCCI Safety Division

PERSONAL PROTECTIVE EQUIPMENT (PPE) MUST BE WORN AT ALL TIMES

13.0 RESPIRABLE CRYSTALLINE SILICA PROGRAM

PURPOSE

This Respirable Crystalline Silica Program was developed to prevent employee exposure to hazardous levels of Respirable Crystalline Silica, which could result through construction activities or occurring on worksites. Respirable Crystalline Silica exposure at hazardous levels can lead to lung cancer, silicosis, chronic obstructive pulmonary disease, and kidney disease. It is intended to meet the requirements of the Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153) established by the Occupational Safety and Health Administration (OSHA).

All work involving chipping, cutting, drilling, grinding, or similar activities on materials containing Crystalline Silica can lead to the release of respirable-sized particles of Crystalline Silica (i.e., Respirable Crystalline Silica). Crystalline Silica is a basic component of soil, sand, granite, and many other minerals. Quartz is the most common form of Crystalline Silica. Many materials found on constructions sites include Crystalline Silica; including but not limited to – cement, concrete, asphalt, pre-formed structures (inlets, pipe, etc.) and others.

Consequently, this program has been developed to address and control these potential exposures to prevent our employees from experiencing the effects of occupational illnesses related to Respirable Crystalline Silica exposure.

SCOPE

The Respirable Crystalline Silica Program applies to all employees who have the potential to be exposed to Respirable Crystalline Silica when covered by the OSHA/Cal-OSHA Standard. The OSHA Respirable Crystalline Silica Construction Standard applies to all occupational exposures to Respirable Crystalline Silica in construction work, except where employee exposure will remain below 25 micrograms of Respirable Crystalline Silica per cubic meter of air (25 μ g/m3) as an 8-hour time-weighted average (TWA) under any foreseeable conditions.

RESPONSIBILITIES

BCCI Construction, LLC firmly believes in protecting the health and safety of our employees is everyone’s responsibility. This responsibility begins with upper management providing the necessary support to properly implement this program. However, all levels of the organization assume a level of responsibility for this program including the following positions.

DIRECTOR of SAFETY

Conduct job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments to determine if an employee’s exposure will be above 25 μ g/m3 as an 8-hour TWA under any foreseeable conditions.

Select and implement into the project’s Exposure Control Plan (ECP) the appropriate control measures in accordance with the Construction Tasks identified in OSHA’s Construction Standard 29 CFR 1926.1153, Table 1; and potentially including (but not limited to) a written ECP, exposure monitoring, Hazard Communication training, medical surveillance, housekeeping, and others.

NOTE: OSHA's Table 1 is a list of 18 common construction tasks along with acceptable exposure control methods and work practices which limit exposure for those tasks.

Ensure materials, tools, equipment, Personal Protective Equipment (PPE), and other resources (such as worker training) required to fully implement and maintain this Respirable Crystalline Silica Program are in place and readily available if needed.

Ensure Project Managers, Site Managers, Competent Persons, and employees are educated in the hazards of Silica exposure and trained to work safely with Silica in accordance with OSHA's Respirable Crystalline Silica Construction Standard and OSHA's Hazard Communication Standard. Managers and Competent Persons may receive more advanced training than other employees.

Maintain written records of training (for example, proper use of respirators), ECPs, inspections (for equipment, PPE, and work methods/practices), medical surveillance (under lock and key), respirator medical clearances (under lock and key) and fit-test results.

Conduct an annual review (or more often if conditions change) of the effectiveness of this program and any active project ECP's which extend beyond a year. This includes a review of available dust control technologies to ensure these are selected and used when practical.

Coordinate work with other employers and contractors to ensure a safe work environment relative to Silica exposure.

PROJECT MANAGERS

Ensure all applicable elements of this Respirable Crystalline Silica Program are implemented on the project including the selection of a Competent Person.

Assist the Director of Safety in conducting job site-assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments to determine if an ECP, exposure monitoring, and medical surveillance is necessary.

Assist in the selection and implementation of the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Table 1; and potentially including (but not limited to) a written ECP, exposure monitoring, Hazard Communication training, medical surveillance, housekeeping, and others.

Ensure employees using respirators have been properly trained, medically cleared, and fit-tested in accordance with the company's Respiratory Protection Program. This process will be documented.

Ensure work is conducted in a manner which will minimize and adequately control the risk to workers and others. This includes ensuring workers use appropriate engineering controls, work practices, and wear the necessary PPE.

When a risk of exposure to Silica dust; verify employees are properly trained on the applicable contents of this program, the project specific ECP, and the applicable OSHA Standards (such as Hazard Communication). Ensure employees are provided appropriate PPE when conducting such work.

COMPETENT PERSON / SITE MANAGER (e.g., Superintendent, Laborer Foreman, etc.)

Make frequent and regular inspections of jobsites, materials, and equipment to implement the written ECP. Identify existing and foreseeable Respirable Crystalline Silica hazards in the workplace and take prompt corrective measures to eliminate or minimize them.

Notify the Project Manager and/or Director of Safety of any deficiencies identified during inspections to coordinate and facilitate prompt corrective action.

Assist the Project Manager and/or Director of Safety in conducting job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments to determine if an ECP, exposure monitoring, and medical surveillance is necessary.

EMPLOYEES

Follow recognized work procedures (such as the Construction Tasks identified in OSHA's Table 1) as established in the project's ECP and this program.

- Use the assigned PPE in an effective and safe manner.
- Participate in Respirable Crystalline Silica exposure monitoring and medical surveillance program.
- Report any unsafe conditions or acts to the Superintendent, Competent Person and/or Director of Safety.
- Report any exposure incidents or any signs or symptoms of Silica illness.

DEFINITIONS

If a definition is not listed in this section, please contact your supervisor. If your supervisor is unaware of what the term means, please contact the Competent Person or your Director of Safety.

Action Level: means a concentration of airborne Respirable Crystalline Silica of 25µg/m3, calculated as an 8-hour TWA.

Competent Person: means an individual who can identify existing and foreseeable Respirable Crystalline Silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them.

Employee Exposure: means the exposure to airborne Respirable Crystalline Silica which would occur if the employee were not using a respirator.

High-Efficiency Particulate Air (HEPA) Filter means a filter is at least 99.97% percent efficient in removing monodispersed particles of 0.3 micrometers in diameter.

Objective Data: means information, such as air monitoring data from industry-wide surveys or calculations based on the composition of a substance, demonstrating employee exposure to Respirable Crystalline Silica associated with a particular product or material or a specific process, task, or activity. The data must reflect workplace conditions closely resembling or with a higher exposure potential than the processes, types of material, control methods, work practices, and environmental conditions in the employer's current operations.

Permissible Exposure Limit (PEL): means the employer shall ensure NO employee is exposed to an airborne concentration of Respirable Crystalline Silica more than 50µg/m3, calculated as an 8-hour TWA.

Physician or Other Licensed Health Care Professional (PLHCP): means an individual whose legally permitted scope of practice (i.e., licensed, registered, or certified) allows him or her to independently provide or be delegated the responsibility to provide some or all the health care services required by the Medical Surveillance Section of the OSHA Respirable Crystalline Silica Standard.

Respirable Crystalline Silica: means Quartz, Cristobalite, and/or Tridymite contained in airborne particles are determined to be respirable by a sampling device designed to meet the characteristics for respirable-particle size- selective samplers specified in the International Organization for Standardization (ISO) 7708:1995: Air Quality-Particle Size Fraction Definitions for Health-Related Sampling.

Specialist: means an American Board-Certified Specialist in Pulmonary Disease or an American Board-Certified Specialist in Occupational Medicine.

REQUIREMENTS

SPECIFIED EXPOSURE CONTROL METHODS

When possible and applicable, BCCI Construction, LLC will conduct activities with potential Silica exposure to be consistent with OSHA Table 1. Supervisors will ensure personnel under their supervision and engaged in a task identified on the OSHA Table 1 have fully and properly implemented the engineering controls, work practices, and Respiratory Protection specified for the task of Table 1 (unless BCCI any has assessed and limited exposure to personnel from Respirable Crystalline Silica in accordance with the Alternative Exposure Control Methods Section). The task(s) being performed by BCCI Construction, LLC identified on the OSHA Construction Standard Table 1 is/are:

TABLE 1 – SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
1	Stationary masonry saws	▪ Use a saw equipped with an integrated water delivery system (continuously feeds water to the blade). ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions.	None	None
2a	Handheld power saws (any blade diameter) when used outdoors	▪ Use a saw equipped with an integrated water delivery system (continuously feeds water to the blade). ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions.	None	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask
2b	Handheld power saws (any blade diameter) when used indoors or in an enclosed area	▪ Use a saw equipped with an integrated water delivery system (continuously feeds water to the blade). ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions.	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask
3	Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less) for tasks performed outdoors only	▪ Use a saw equipped with a commercially available dust collection system. ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions. ▪ Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.	None	None
4a	Walk-behind saws when used outdoors	▪ Use a saw equipped with an integrated water delivery system (continuously feeds water to the blade). ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions.	None	None
4b	Walk-behind saws when used indoors or in an enclosed area	▪ Use a saw equipped with an integrated water delivery system (continuously feeds water to the blade).	N95 (or Greater Efficiency) Filtering Face	N95 (or Greater Efficiency) Filtering Face

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
		▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions.	Piece or Half Mask	Piece or Half Mask
5	Drivable saws for tasks performed outdoors only	▪ Use a saw equipped with an integrated water delivery system (continuously feeds water to the blade). ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions.	None	None
6	Rig-mounted core saws or drills	▪ Use a tool equipped with an integrated water delivery system (supplies water to cutting surface). ▪ Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
7	Handheld and stand-mounted drills (including impact and rotary hammer drills)	▪ Use a drill equipped with a commercially available shroud or cowling with a dust collection system. ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions. ▪ Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. ▪ Use a HEPA-filtered vacuum when cleaning holes.	None	None
8	Dowel drilling rigs for concrete for tasks performed outdoors only	▪ Use a shroud around drill bit with a dust collection system. ▪ Dust collector must have a filter with 99% or greater efficiency and a filter cleaning mechanism. ▪ Use a HEPA-filtered vacuum when cleaning holes.	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask
10a	Jackhammers and handheld powered chipping tools when used outdoors	▪ Use a tool with a water delivery system (supplies a continuous stream or spray of water at the point of impact).	None	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask
10b	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	▪ Use a tool with a water delivery system (supplies a continuous stream or spray of water at the point of impact).	N95 (Greater Efficiency) Filtering Face Piece or Half Mask	N95 (Greater Efficiency) Filtering Face Piece or Half Mask
10c	Jackhammers and handheld powered chipping tools when used outdoors	▪ Use a tool equipped with commercially available shroud and dust collection system. ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions. ▪ Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or	None	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
		greater efficiency and a filter-cleaning mechanism.		
10d	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	▪ Use a tool equipped with a commercially available shroud and dust collection system. ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions. ▪ Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask
11	Handheld grinders for mortar removal (i.e., tuck pointing)	▪ Use a grinder equipped with a commercially available shroud and dust collection system. ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions. ▪ Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	N95 (or Greater Efficiency) Filtering Face Piece or Half Mask	Powered Air-Purifying Respirator (PAPR) with P100 Filters
12a	Handheld grinders for uses other than mortar removal for tasks performed outdoors only	▪ Use a grinder equipped with an integrated water delivery system (continuously feeds water to the grinding surface). ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions.	None	None
12b	Handheld grinders for uses other than mortar removal when used outdoors	▪ Use a grinder equipped with a commercially available shroud and dust collection system. ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions. ▪ Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	None	None
12c	Handheld grinders for uses other than mortar removal when used indoors or in an enclosed area	▪ Use a grinder equipped with a commercially available shroud and dust collection system. ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions. ▪ Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	None	N95 (Greater Efficiency) Filtering Face Piece or Half Mask
13a	Walk-behind milling	▪ Use a machine equipped with an integrated	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
	machines and floor grinders	water delivery system (continuously feeds water to the cutting surface). ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions.		
13b	Walk-behind milling machines and floor grinders	▪ Use a machine equipped with dust collection system recommended by the manufacturer. ▪ Operate and maintain tool(s) in accordance with manufacturer's instructions to minimize dust emissions. ▪ Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. ▪ When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.	None	None
14	Small drivable milling machines (less than half-lane)	▪ Use a machine equipped with supplemental water sprays designed to suppress dust. ▪ Water must be combined with a surfactant. ▪ Operate and maintain machine to minimize dust emissions.	None	None
15a	Large drivable milling machines (half-lane and larger) for cuts of any depth on asphalt only	▪ Use a machine equipped with an exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. ▪ Operate and maintain machine to minimize dust emissions.	None	None
15b	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	▪ Use a machine equipped with an exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. ▪ Operate and maintain machine to minimize dust emissions.	None	None
15c	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	▪ Use a machine equipped with supplemental water spray designed to suppress dust. ▪ Water must be combined with a surfactant. ▪ Operate and maintain machine to minimize dust emissions.	None	None
16	Crushing machines	▪ Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., hoppers, conveyers, sieves/sizing or vibrating components, and discharge points). ▪ Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions. ▪ Use a ventilated booth which provides fresh, climate-controlled air to the operator, or a remote-control station.	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
17a	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	▪ Operate equipment from within an enclosed cab.	None	None
17b	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	▪ When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions.	None	None
18a	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	▪ Apply water and/or dust suppressants as necessary to minimize dust emissions.	None	None
18b	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	▪ When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab.	None	None

When implementing the control measures as specified in Table 1, BCCI shall:

- For tasks performed indoors /enclosed areas, provide a means of exhaust as needed to minimize the accumulation of visible airborne dust.
- For tasks using wet methods, apply water at flow rates sufficient to minimize visible dust
- For measures implemented for an enclosed cab/booth, ensure the enclosed cab/booth:
    - Is maintained as free as practicable from settled dust.
    - Has door seals and closing mechanisms in proper working condition.

- Gaskets and seals are in good condition and working properly.
- Is under positive pressure maintained through continuous delivery of fresh air.
- Has intake air been filtered through a filter which is 95% efficient in the 0.3-10.0μm range (e.g., MERV-16)
- Has heating and cooling capabilities.
- Where an employee performs more than one task included contained within Table 1 during a shift, and the total duration of all tasks combined is more than four hours, the required Respiratory Protection for each task is the Respiratory Protection specified for more than four hours per shift.
- If the total duration of all tasks on Table 1 combined is less than four hours, the required Respiratory Protection for each task is the Respiratory Protection specified for less than four hours per shift.

ALTERNATIVE EXPOSURE CONTROL METHODS

Alternative Exposure Control Methods apply for tasks NOT listed in Table 1, or where BCCI Construction, LLC cannot fully and properly implement the engineering controls, work practices, and Respiratory Protection described in this Table 1.

First, BCCI Construction, LLC will assess the exposure of each employee who is or may reasonably be expected to be exposed to Respirable Crystalline Silica at or above the Action Level in accordance with either the Performance Option or the Scheduled Monitoring Option.

- Performance Option – BCCI Construction, LLC will assess the 8-hour Time Weighted Average (TWA) exposure for each employee based on any combination of air monitoring data or objective data sufficient to accurately characterize employee exposures to Respirable Crystalline Silica.
- Scheduled Monitoring Option:
    - BCCI Construction, LLC will perform initial monitoring to assess the 8-hour TWA exposure for each employee based on one or more personal breathing zone air samples reflecting the exposures of employees on each shift, for each job classification, and in each work area.
    - Where several employees perform the same task(s) on the same shift and in the same work area, BCCI will plan to monitor a representative fraction of these employees. When using representative monitoring, BCCI will sample the employee(s) who are expected to have the highest exposure to Respirable Crystalline Silica.
    - If initial monitoring indicates employee exposures are below the Action Level, BCCI will probably discontinue monitoring for those employees whose exposures are represented by such monitoring.

- Where the most recent exposure monitoring indicates employee exposures are at or above the Action Level but at or below the PEL, BCCI will repeat such monitoring within six months of the most recent monitoring.

- Where the most recent exposure monitoring indicates employee exposures are above the PEL, BCCI will repeat such monitoring within three months of the most recent monitoring.

- Where the most recent (non-initial) exposure monitoring indicates employee exposures are below the Action Level, BCCI will repeat such monitoring within six months of the most recent monitoring until two consecutive measurements, taken seven or more days apart, are below the Action Level, at which time BCCI will probably discontinue monitoring for those employees whose exposures are represented by such monitoring, except when a reassessment is required.

- BCCI will reassess exposures whenever a change in the production, process, control equipment, personnel, or work practices may reasonably be expected to result in new or additional exposures at or above the Action Level, or when BCCI has any reason to believe new or additional exposures at or above the Action Level have occurred.

BCCI will ensure all Respirable Crystalline Silica samples taken to satisfy the monitoring requirements of this program and OSHA are collected by a qualified individual (e.g., Certified Industrial Hygienist) and the samples are evaluated by a qualified laboratory (e.g., accredited to ANS/ISO/IEC Standard 17025:2005 with respect to Crystalline Silica analyses by a body who is compliant with ISO/IEC Standard 17011:2004 for implementation of quality assessment programs).

Within five working days after completing an exposure assessment, BCCI will individually notify each affected employee in writing of the results of the assessment or post the results in an appropriate location accessible to all affected employees.

Whenever an exposure assessment indicates employee exposure is above the PEL, BCCI will describe in the written notification the corrective action being taken to reduce employee exposure to or below the PEL.

Where air monitoring is performed, BCCI will provide affected employees or their designated representatives an opportunity to observe any monitoring of employee exposure to Respirable Crystalline Silica. When observation of monitoring requires entry into an area where the use of protective clothing or equipment is required for any workplace hazard, BCCI will provide the observer with protective clothing and equipment at NO cost and shall ensure the observer uses such clothing and equipment.

Once air monitoring has been performed, BCCI will determine its method of compliance based on the monitoring data and the hierarchy of controls. BCCI will use engineering and work practice controls to reduce and maintain employee exposure to Respirable Crystalline Silica to or below the PEL, unless BCCI can demonstrate such controls are NOT feasible. Wherever such feasible engineering and work practice controls are NOT sufficient to reduce employee exposure to or below the PEL, BCCI will nonetheless use them to reduce employee exposure to the lowest feasible level and shall supplement them with the use of Respiratory Protection.

In addition to the requirements of this program, BCCI will comply with other programs and OSHA standards (such as 29 CFR 1926.57 [Ventilation]), when applicable where abrasive blasting is conducted using Crystalline Silica-containing blasting agents, or where abrasive blasting is conducted on substrates containing Crystalline Silica.

CONTROL METHODS

BCCI will provide control methods which are either consistent with OSHA Table 1 or otherwise minimize worker exposures to Silica. These exposure control methods can include engineering controls, work practices, and Respiratory Protection.

RESPIRATORY PROTECTION

Where Respiratory Protection is required by this program, BCCI will provide each employee an appropriate respirator, which is compliant with the requirements of the company's Respiratory Protection Program and the OSHA Respiratory Protection Standard (29 CFR 1910.134).

Respiratory Protection is required when specified by the OSHA Construction Standard Table 1, for tasks NOT listed in Table 1, or where the company has NOT fully / properly implemented the engineering controls, work practices, and Respiratory Protection described in Table 1. Situations requiring Respiratory Protection include:

- Where exposures exceed the PEL during periods necessary to install or implement feasible engineering and work practice controls.
- Where exposures exceed the PEL during tasks, such as certain maintenance and repair tasks, for which engineering, and work practice controls are NOT feasible; and
- During tasks for which an employer has implemented all feasible engineering and work practice controls and such controls are NOT sufficient to reduce exposures to or below the PEL.

HOUSEKEEPING

BCCI DOES NOT ALLOW dry sweeping or dry brushing where such activity could contribute to employee exposure to Respirable Crystalline Silica unless wet sweeping, HEPA-filtered vacuuming, or other methods minimizing the likelihood of exposure are NOT feasible.

BCCI DOES NOT ALLOW compressed air to be used to clean clothing or surfaces where such activity could contribute to employee exposure to Respirable Crystalline Silica unless:

- The compressed air is used in conjunction with a ventilation system to effectively capture the dust cloud created by the compressed air; or
- NO alternative method is feasible.

WRITTEN EXPOSURE CONTROL PLAN

When employee exposure on a construction project is expected to be at or above the Action Level, a Written Exposure Control Plan (ECP) will be established and implemented. This ECP will contain at least the following elements:

- A description of tasks in the workplace which involve exposure to Respirable Crystalline Silica.

- A description of the engineering controls, work practices, and Respiratory Protection used to limit employee exposure to Respirable Crystalline Silica for each task.

- A description of the housekeeping measures used to limit employee exposure to Respirable Crystalline Silica.

- A description of the procedures used to restrict access to work areas, when necessary, to minimize the number of employees exposed to Respirable Crystalline Silica and their level of exposure, including exposures generated by other employers or sole proprietors.

The written ECP will designate a Competent Person to make frequent and regular inspections of jobsites, materials, and equipment to ensure the ECP is implemented.

The written ECP will be reviewed at least annually to evaluate the effectiveness of it and update it as necessary in conjunction with the annual review of the Code of Safe Work Practices. The written ECP will be readily available for examination and copying, upon request, to each employee covered by this program and/or ECP, their designated representatives, Cal/OSHA, and OSHA.

MEDICAL SURVELLIANCE

Medical surveillance will be made available for each employee who will be required to use a respirator for 30 or more days per year due to their Respirable Crystalline Silica exposure. Medical surveillance (i.e., medical examinations and procedures) will be performed by a PLHCP and provided at no cost to the employee at a reasonable time and place.

BCCI will make available an initial (baseline) medical examination within 30 days after initial assignment, unless the employee has received a medical examination meeting the requirements of the OSHA Respirable Crystalline Silica Construction Standard within the last three years. The examination shall consist of:

- A medical and work history, with emphasis on past, present, and anticipated exposure to Respirable Crystalline Silica, dust, and other agents affecting the respiratory system in addition to any history of respiratory system dysfunction, including signs and symptoms of respiratory disease (e.g., shortness of breath, cough, wheezing), history of tuberculosis, and smoking status and history.

- A physical examination with special emphasis on the respiratory system.

- A chest X-ray (a single posterior-anterior radiographic projection or radiograph of the chest at full inspiration recorded on either film [NO less than 14 x 17 inches and NO more than 16 x 17 inches] or digital radiography systems) interpreted and classified

according to the International Labor Office (ILO) International Classification of Radiographs of Pneumoconiosis by a NIOSH-certified B Reader.

- A pulmonary function test to include forced vital capacity (FVC) and forced expiratory volume in one second (FEV1) and FEV1/FVC ratio, administered by a spirometry technician with a current certificate from a NIOSH-approved spirometry course.

- Testing for latent tuberculosis infection; and

- Any other tests deemed appropriate by the PLHCP.

BCCI will make available medical examinations which include the procedures (except testing for latent tuberculosis infection) at least every three years. If recommended by the PLHCP, periodic examinations can be more frequently than every three years.

BCCI will ensure the examining PLHCP has a copy of the OSHA Respirable Crystalline Silica Construction Standard, this program, and the following information:

- A description of the employee's former, current, and anticipated duties as they relate to the employee's occupational exposure to Respirable Crystalline Silica.

- The employee's former, current, and anticipated levels of occupational exposure to Respirable Crystalline Silica.

- A description of any personal protective equipment (PPE) used or to be used by the employee, including when and for how long the employee has used or will use the equipment.

- Information from records of employment-related medical examinations previously provided to the employee and currently within the control of BCCI.

BCCI will ensure the PLHCP explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of each medical examination performed. The written report shall contain:

- A statement indicating the results of the medical examination, including any medical condition(s) which could place the employee at increased risk of material impairment to health from exposure to Respirable Crystalline Silica and any medical conditions requiring further evaluation or treatment.

- Any recommended limitations on the employee's use of respirators.

- Any recommended limitations on the employee's exposure to Respirable Crystalline Silica.

- A statement the employee should be examined by a Specialist if the chest X-ray is classified as 1/0 or higher by the B Reader, or if referral to a Specialist is otherwise deemed appropriate by the PLHCP.

BCCI will also obtain a written medical opinion from the PLHCP within 30 days of the medical examination. The written opinion shall contain only the following to protect the employee's privacy:

- The date of the examination.
- A statement the examination has met the requirements of the OSHA Respirable Crystalline Silica Construction Standard; and
- Any recommended limitations on the employee's use of respirators.

If the employee provides written authorization, the written opinion shall also contain either or both of the following:

- Any recommended limitations on the employee's exposure to Respirable Crystalline Silica; and/or
- A statement the employee should be examined by a Specialist if the chest X-ray is classified as 1/0 or higher by the B Reader, or if referral to a Specialist is otherwise deemed appropriate by the PLHCP.

If the PLHCP's written medical opinion indicates an employee should be examined by a Specialist, BCCI will make available a medical examination by a Specialist within 30 days after receiving the PLHCP's written opinion. BCCI will ensure the examining Specialist is provided with all the information the employer is obligated to provide to the PLHCP.

BCCI will ensure the Specialist explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of the examination. The written report will contain:

- A statement indicating the results of the medical examination, including any medical condition(s) which could place the employee at increased risk of material impairment to health from exposure to Respirable Crystalline Silica and any medical conditions requiring further evaluation or treatment.
- Any recommended limitations on the employee's use of respirators.
- Any recommended limitations on the employee's exposure to respirable crystalline Silica.

In addition, BCCI will obtain a written opinion from the Specialist within 30 days of the medical examination. The written opinion shall contain the following:

- The date of the examination.
- Any recommended limitations on the employee's use of respirators.
- If the employee provides written authorization, the written opinion shall also contain any recommended limitations on the employee's exposure to Respirable Crystalline Silica.

HAZARD COMMUNICATION

BCCI will include Respirable Crystalline Silica in the company's Hazard Communication Program established to comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200). BCCI will ensure each employee has access to labels on containers of Crystalline Silica and those containers respective Safety Data Sheets (SDS's).

All employees will be trained in accordance with the provisions of the OSHA Hazard Communication Standard and the Training Section of this program. This training will cover concerns relating to cancer, lung effects, immune system effects, and kidney effects.

BCCI will ensure each employee with the potential of being exposed at or above the Action Level for Respirable Crystalline Silica can demonstrate knowledge and understanding of at least the following:

- The health hazards associated with exposure to Respirable Crystalline Silica.
- Specific tasks in the workplace which could result in exposure.
- Specific measures BCCI has implemented to protect employees from exposure to Respirable Crystalline Silica, including engineering controls, work practices, and respirators to be used.
- The contents of the OSHA Respirable Crystalline Silica Construction Standard.
- The identity of the Competent Person designated by BCCI; and
- The purpose and a description of the company's Medical Surveillance Program.

BCCI will make a copy of the OSHA Respirable Crystalline Silica Construction Standard readily available without cost to any employee upon request.

RECORDKEEPING

BCCI will make and maintain an accurate record of all exposure measurements taken to assess employee exposure to Respirable Crystalline Silica. This record will include at least the following information:

- The date of measurement for each sample taken.
- The task monitored.
- Sampling and analytical methods used.
- Number, duration, and results of samples taken.
- Identity of the laboratory who performed the analysis.
- Type of personal protective equipment (PPE), such as respirators, worn by the employees monitored.

- Name, social security number, and job classification of all employees represented by the monitoring, indicating which employees were monitored.

BCCI will ensure any exposure records are maintained and made available in accordance with 29 CFR 1910.1020. Exposure records will be kept for at least 30 years. The employer shall make and maintain an accurate record of all objective data relied upon to comply with the requirements of the OSHA Respirable Crystalline Silica Construction Standard. This record shall include at least the following information:

- The Crystalline Silica-containing material in question.
- The source of the objective data.
- The testing protocol and results of testing.
- A description of the process, task, or activity on which the objective data were based.
- Other data relevant to the process, task, activity, material, or exposures on which the objective data were based.

BCCI will ensure any objective data is maintained and made available in accordance with 29 CFR 1910.1020. Objective data records will be kept for at least 30 years. BCCI will make and maintain an accurate record for each employee enrolled in the Medical Surveillance portion of this program. The record shall include the following information about the employee:

- Name and social security number.
- A copy of the PLHCPs' and/or Specialists' written medical opinions; and
- A copy of the information provided to the PLHCPs and Specialists.

BCCI will ensure medical records are maintained and made available in accordance with 29 CFR 1910.1020. Medical records will be kept under lock and key for at least the duration of employment plus 30 years. It is necessary to keep these records for extended periods because Silica-related diseases such as cancer often cannot be detected until several decades after exposure. However, if an employee works for an employer for less than one year, the employer DOES NOT have to keep the medical records after employment ends if the employer gives those records to the employee.

APPENDICES

APPLICABLE FORMS

APPENDIX A – SAMPLE WRITTEN EXPSOURE CONTROL PLAN

Company:
Person Completing the Survey:
Description of Task(s):
Control Description:

CONTROLS

- Use of jackhammer equipped with the appropriate, commercially available shroud and a vacuum dust collection system with the flow rate recommended by the jackhammer manufacturer, a filter that is at least 99% efficient, and a filter cleaning mechanism.

- Use a portable fan to exhaust air and prevent the buildup of dust.

WORK PRACTICES

- Check shrouds and hoses to make sure they are NOT damaged before starting work.

- Make sure the hoses DO NOT become kinked or bent while working.

- Use switch on vacuum to activate filter cleaning at the frequency recommended by the manufacturer.

- Replace vacuum bags as needed to prevent overfilling.

- Use the jackhammer & vacuum controls according to manufacturer's instructions for reducing the release of visible dust.

- If visible dust increases, check controls and adjust as needed.

RESPIRATORY PROTECTION

- Use respirator with APF of 10 the entire time the task is being performed.

- Reference the written Respiratory Protection Program for information on selection, training, medical clearance, and fit testing requirement; in addition, to properly use and understand the instructions for respirators (e.g., being clean shaven when using a respirator to get a solid seal against the face).

HOUSEKEEPING

- Dust containing silica on work surfaces and equipment must be cleaned up using wet methods or a HEPA-filtered vacuum.

- DO NOT USE compressed air or dry sweeping for removing dust and debris containing silica from work surfaces.

- Dispose of used vacuum bags in a container and keep the container sealed.

PROCEDURES USED TO RESTRICT ACCESS TO WORK AREAS

- Schedule the work so that only employees who are engaged in the task (the jackhammer operator and employees helping the operator) are in the area.

NOTE: Employers can include additional information, such as Medical Surveillance, Exposure Assessment Information, and Training, if it is useful to them, but they are NOT required to do so under the Silica Standard.

14.0 RESPIRATORY PROTECTION PROGRAM

PURPOSE

This document establishes uniform guidelines for complying with the requirements of the Occupational Safety & Health Administration (OSHA) Respiratory Protection Standard (29 CFR 1910.134) and California Code of Regulations (CCR) Title 8, Section 5144, Respiratory Protection Standard for the proper selection, use, and care of respiratory protection equipment. This program shall be reviewed on an annual basis to determine the continued effectiveness.

POLICY

The goal of BCCI Construction Company Written Respiratory Protection Program is to insure adequate protection for the health of every employee. Every feasible effort shall be made to provide a work environment free from hazardous concentrations of air contaminants or oxygen deficiency. This shall be accomplished by material substitution, acceptable engineering controls, or work practice controls. When this objective cannot be met by the foregoing, appropriate respiratory protection (respirators) will be provided at NO charge to the employee in accordance with the provisions of this program. The scope of this program will include users of respiratory protection equipment, whether use is voluntary or required.

All respirators, cartridges, and accessories provided by BCCI Construction Company will have appropriate approval by the National Institute for Occupational Safety and Health (NIOSH). Employees required to use respirators because of exposure to toxic substances or dusts will do so as a condition of employment. Employees who are required to use respiratory protection will be trained in the use, proper fit, appropriate test, and will be medically screened/cleared.

RESPONSIBILITIES

This Written Respiratory Protection Program is administered by the “Program Administrator, (PA).” This responsibility is assigned to the Director of Safety located at the Corporate Office in San Francisco; CA. Currently the PA is Matty Kernen and Tony Fisher.

USERS

Users shall use respiratory protection in accordance with applicable Operating Instructions. Users shall report to the contracted medical facility, and discuss any personal physical condition, which may prevent the use of respiratory protection with a Licensed Health Care Provider (PLHCP). Users shall report to their supervisor any new tasks for which they wear a respirator.

SUPERVISION

Supervisors shall ensure only those employees trained in the proper use of respirators and having passed qualitative fit tests where required, engage in the operations requiring respiratory protection (to include emergency operations). The operations requiring respiratory protection are listed in the section below. Refresher training shall be presented annually.

Supervisors shall ensure employees use Respiratory Protection in accordance with applicable operations inspections. Supervisors shall report all new uses of respirators to the Program

Administrator (PA). Supervisors shall ensure chemical cartridge change-out schedules are followed.

PROGRAM ADMINISTRATOR / SAFETY / INDUSTRIAL HYGIENIST

The Program Administrator (PA) Matty Kernen & Tony Fisher SHALL specify the type of respirator to be used for each operation requiring Respiratory Protection. The PA is responsible for ensuring each employee using Respiratory Protection receives training, medical clearance, and fit testing. The PA will provide names of employees who wear Respiratory Protection to the contract medical clinic including the type(s) of respirators worn.

The PA shall maintain the following records for each employee required to use Respiratory Protection:

- Training Rosters of training sessions, which include employee signatures & dates
- Results of qualitative fit testing & Restrictions (e.g., prescription eyeglasses or beards)

Information on airborne exposures including chemical agents and exposure levels. Exposures exceeding the action limits shall be provided to medical facility at least annually to ensure proper surveillance is conducted. Safety Data Sheet (SDS) information and dust exposure information based on the chemical makeup of the particulates in the air.

The PA or designee shall conduct frequent random inspections to ensure respirators are properly used, cleaned, and maintained. The PA shall establish chemical cartridge change out schedules for the cartridges and communicate to those impacted supervisors. The PA shall update the written program as needed, reflecting any changes in tasks, types of respirators, personnel, or other relevant information.

CONTRACT OR LOCAL MEDICAL CLINIC

The Contract or Local Medical Clinic shall be responsible for declaring individuals in the program capable of wearing a respirator and shall select the methods for, coordinate, and maintain surveillance of each employee. Medical Surveillance will include:

Medical Evaluations meeting the requirements of the standard to determine everyone’s capability of wearing respiratory equipment. Medical Surveillance, as recommended in individual sections of airborne chemicals where exposures exceed the criteria referenced.

Completion of Appendix C of the Respiratory Protection Standard 29 CFR 1910.134

The Contract or Local Medical Clinic physician shall report to departmental supervision and PA the names of employees with restrictions and employees NOT approved to wear Respiratory Protection.

FIT TESTERS

BCCI Construction, LLC utilizes a third-party agency to conduct the annual FIT Testing and Medical Clearances for all personnel, on all the types of respirators the employee may wear, in their area. BCCI Safety Division is responsible for the Respirator Use Training.

The FIT Tester shall obtain all appropriate training documentation and ensure the company and PA maintains documentation. Documentation of the Pass / Fail Qualitative test shall be maintained at the company's Corporate Office located in San Francisco, CA for all employees required by BCCI Construction Company to participate in the Respiratory Protection Program.

Qualitative FIT Testing shall adhere to the following schedule:

- First Test: Irritant Smoke
- Second Test: Bittrex
- Third Test: Amyl-Acetate
- Fourth Test: Saccharin

Fit Testing shall be conducted in the last quarter of the calendar year for all employees who are required to wear Respirators.

INDUSTRIAL HYGIENE / SAFETY

The Safety Division is responsible for the management and auditing of the BCCI Written Respiratory Protection Program. The Safety Division must approve any changes to the company's Written Respiratory Protection Program.

The Safety Division will also conduct appropriate surveillance of work areas and work conditions to determine the degree of employee exposure to toxic materials. In addition; Safety will be responsible for the following:

- Communication of jobs / tasks requiring Respiratory Protection.
- Assessing (completed by a Certified Industrial Hygienist) the level and type of Air Contaminants present in the employee's workspace.
- Development and identification of training on the use of Respiratory Protection.
- Development, implementation, and sustainment of the Respiratory Protection FIT-Testing Program.
- Provide alternative Respiratory Protection for employees with respiratory limitations (e.g., Powered Air Purifying Respirators (PAPR)).
- Assessing the toxicity and potential exposure of a new material prior to the materials arriving on-site.

MEDICAL NOTIFICATION

The employee will be notified by Contract or Local Medical Facility of their medical ability or inability to wear Respiratory Protection and shall be given the results or restrictions in writing. In addition, employees determined NOT able to wear a respirator, the contract or local medical facility shall notify the Safety Division and the employee's supervisor in writing. The Contactor

or Local Medical Facility, and Safety Division shall maintain a log of employees NOT able to wear Respiratory Protection.

SELECTION OF RESPIRATORY PROTECTION EQUIPMENT

Respiratory Protection equipment shall be selected based on the hazards to which the employee may be exposed. This will include the nature of the hazard (including the chemical characteristics, exposure levels, and applicable exposure limits), nature of the hazardous operation, location of the hazardous area, time Respiratory Protection is required, work activity, respirator characteristics and limitations, and Respirator Protection factors. All respirators used will be approved by National Institute for Occupational Safety and Health (NIOSH). Respirator Cartridges authorized by BCCI Construction Company are as follows:

Honeywell P100 (Part 7580P100)

Honeywell P100 (Part 7582P100)

Honeywell P100 (75SCL)

RESPIRATORS AUTHORIZED by BCCI CONSTRUCTION, LLC

North 7700-30 Half-Face Respirator

Moldex 9000 Full-Face Respirator

MEDICAL EVALUATION OF ALL RESPIRATOR WEARERS

Medical evaluations will be conducted according to the standard to include the following:

- A thorough Medical History.
- A (“HANDS-ON”) Physical Examination, Pulmonary Function Test.
- A PA Chest X-Ray when Medically Indicated.
- An Electrocardiogram (EKG) initially, again at age 40 and then every five (5) years; and thereafter or more frequently if medically indicated.

THE FREQUENCY OF THESE EVALUATIONS ARE AS FOLLOWS

- Prior to Job Placement in a position, which will require use of respirators.
- Every three (3) years or more frequent as medically indicated.
- When there is evidence of a significant change in employee’s health, which may adversely affect employee’s ability to safely wear a respirator.

OSHA REQUIREMENTS; MEDICAL FACILITIES SHOULD

- Provide Physician or Licensed Health Care Professional with a copy of the Written Respiratory Protection Program and a copy of the Medical Section of the OSHA Standard 29 CFR 1910.134.
- Provide the following information to the PLHCP prior to a recommendation can be made:
    - Type and Weight of Respirator
    - Duration and Frequency of Use
    - Expected Physical Work Effort
    - Personal Protective Equipment (PPE)
    - Potential Temperature and Humidity Extremes
- Ensure Medical Evaluations for Respirators are conducted “Prior to Initial FIT Testing and Job Placement.”

MEDICAL EVALUATIONS

One of the following forms should be used when examining an employee, prior to FIT Testing and Job Placement, for respiratory use:

- New Employees or Employees who have NOT yet completed this form; Comprehensive Medical and Occupational Health History which has been modified to include information required for a Comprehensive Respiratory Evaluation; and

- Employees who have already completed the Comprehensive History Form; the Interval Medical History Form, which has been modified to include information for a comprehensive respiratory evaluation shall be completed.

DISCUSSION OF RESULTS OF EVALUATION WITH EMPLOYEE

Personnel must be given the opportunity to discuss the results of their evaluation with the PLHCP (e.g., nurse practitioner, physician's assistant, etc.) This discussion MUST BE DOCUMENTED.

MEDICAL RECOMMENDATION(S)

- Statement regarding the employee(s) ability to use the respirator.

- Limitations on Respirator use.

- Need for Medical Follow-Up

- Employee(s) Must be provided with a copy of the Medical.

RECOMMENDATIONS

- A Statement stating the employee(s) have been provided a copy of the written recommendation.

NOTE: The Health Status Report Form (Completed by the employee and PLHCP) can be utilized to make this medical recommendation. Any additional comments (e.g., need for medical follow-up,) may be written at the bottom of the form.

CRITERIA FOR RE-EVALUATION

Locations of Facilities should follow criteria for re-evaluation to meet OSHA Requirements:

- Employee(s) report Medical Complaints, related to the ability to use of a respirator.

- PLHCP, Supervisor, Safety Manager (PA) feels an employee needs to be re-evaluated.

- When the information from the Respiratory Protection Program, FIT Testing, or Program Evaluation indicates the need for an employee to be re-evaluated; and

- When a change in the work condition(s) may result in a substantial increase in the physiological burden on the employee(s).

FIT TESTING FOR RESPIRATORY PROTECTION EQUIPMENT

FIT Testing will be performed annually for ALL personnel using tight fitting respirators and will be repeated if the employee has any of the following:

- Significant Weight Loss or Gain (e.g., of 20 pounds or more).
- Significant facial scarring in the area where the face piece seal.
- Significant Dental changes, Reconstructive, or Cosmetic Surgery.
- Employee indicating problems with achieving a good fit/seal.

All FIT Testing shall be performed in the negative pressure mode using Qualitative methods outlined in the Respiratory Protection Standard located in *29 CFR 1910.134* and Cal-OSHA Standard found in *Title 8, §5144*. FIT Testing procedures will follow those as described in *29 CRF 1910.134* and California Code of Regulation (CCR) *Title 8, §5144*.

COMFORT

Once the type of respirator has been determined, the employee should be given the opportunity to select a respirator which provides the most comfortable fit. An assessment of comfort should include the following:

a. Proper placement of chin strap.
b. Strap tension.
c. Slip Tendency.
d. Nose Bridge Fit.
e. FIT for Safety Glasses.
f. Movement Hindrance(s).
g. Mask Position on the Nose.
h. Distance from Nose tip to Bridge of Nose.

FAMILIARIZATION:

The employee should don and doff (take on and off) the respirator several times to become familiar with the respirators fit and adjustability. The employee should wear the respirator long enough to determine the comfort.

QUALITATIVE FIT TESTING:

Qualitative FIT Testing is based on the wearer’s subjective responsiveness to a test or chemical. FIT Testing Procedures are in the written program.

PROPER USE, STORAGE, & CARE OF RESPIRATORY PROTECTION EQUIPMENT:

Half-Face elastomeric face-piece respirators will be assigned to individuals for their exclusive use. The employee(s) are responsible for the maintenance and cleaning of the respirator assigned to them.

A Respirator shall NOT be worn if facial hair comes between the sealing periphery of the face piece and the face, or if facial hair interferes with the valve function. An employee who has hair (e.g., stubble, sideburns, beard, etc.) which passes between the face and the sealing surface of the respirator face piece shall NOT be permitted to wear a respirator. Other alternatives may be the use of a full-face or PAPR for the employee.

Other conditions (e.g., temple pieces on glasses, missing dentures, scars, ingrown facial hair, deformities, or unusual facial features) may affect the quality of the face-to-face and must be addressed prior to the employee(s) begin hazardous working operations.

No employee requiring the use of glasses (corrective lenses) shall use a full-face respirator unless the employee is provided with special lenses for the face which will not break the facial seal, or the employee can safely do their work temporarily without their glasses.

Employees shall inspect their respirators prior to each use. Worn or broken parts shall be replaced only from the manufacturer's parts listing. Substitution of parts from other manufacturer's model respirators will invalidate the approval of the protective device. The filter cartridges of the respirator will be changed by the employee when breathing becomes unacceptable or contaminates can be tasted or smelled inside the respirator.

A general respirator should include the following items:

a. Tightness of Fit-to-Face.

b. Condition of Face Piece, Straps, Flapper Valves, and Cartridges.

c. Condition of Exhalation and Inhalation Valves.

d. Pliability and Flexibility of Rubber Parts.

e. Conditions of Lenses if Full-Faced Pieces are used.

Chemical cartridge respirators shall be replaced based on use, or when breathing becomes difficult or if the contaminant is tasted or smelled. End of Service Life Indicators (ESLI) should be checked at the beginning of the work shift before donning the mask. If the contaminant is tasted or smelled within the allowed use-time, leave the contaminated are, inspect the respirator, and verify fit. If the respirator is NOT damaged and is properly donned, change the cartridges and report apparent early breakthrough to supervisor.

FIELD TESTS (FIT CHECK):

Employees shall perform a negative and positive pressure test (FIT Check) as described below before each use of a respirator.

Each of the following test shall be performed by the employee each time a respirator is donned:

POSITIVE PRESSURE TEST:

This test applies to those respirators which have an exhalation valve and can be locked. The procedure to perform this test is as follows: close or block off the exhalation valve and exhale gently into the face piece. If a slight positive pressure is built up with no apparent outward leakage around the seal, then the face-to-face seal is satisfactory.

NEGATIVE PRESSURE TEST (FIT CHECK):

Close the inlet opening of the respirator with hands or tape, inhale gently so the face collapses slightly, and hold breath for ten seconds. If the face piece remains slightly collapsed and no inward leakage occurs, then the face piece-to-face seal is satisfactory.

CARING FOR RESPIRATORY PROTECTION EQUIPMENT:

Respirators shall NOT be left in the work area; contamination of the respirator or cartridges could occur.

Prior to storage, each respirator shall be inspected. Cleaned respirators will be stored in a sealed bag with the face-piece and exhalation valves resting in the normal position. The storage location will be protected from dust, sunlight heat, extreme cold, excessive moisture, and damaging chemicals.

Storage of cartridges currently in use shall be separated from the mask, and place in a sealable and reusable container(s) (e.g., Tupperware or Similar).

Re-usable respirators must be cleaned at least daily whenever inspection indicates cleaning is necessary. Cleaning materials are available from the safety office, or the designated mask cleaning areas.

TRAINING:

The extent and frequency of employee training depends primarily on the nature and extent of the hazard. All employees and supervisors in any area where Respiratory Protection is required; will attend training courses annually. Hazards of organic vapors, aluminum dusts, and any other hazards the mask are intended to protect the employee(s) from will be discussed. Safety Data Sheet (SDS) information on all products will be made available to all employee(s) who are always using the respiratory equipment.

RESPIRATOR TRAINING PROGRAM:

The Respirator Training Program must include the following:

- An explanation of the problems involved in the misuse of a respirator.
- Discussion of the nature of Airborne Contaminants against, which the employee(s) must be protected; controlling the exposure to the point where respirators are NOT required.
- Discussion of “WHY” the respirator has been selected for a particular job-task is the proper protective device/equipment to be used.

- Instruction on the respirators' limitations.

- Instructions on "HOW" to use the respirators effectively in an emergency, including respirator malfunction.

- Instructions on "HOW" to don the respirator; positioning on the face, set of strap tension; and the comfortable wear of the respirator.

- Instructions on "HOW" to determine when the cartridges of a respirator need to be replaced (e.g., breathing restrictions, odor breakthroughs, ESLI, irritation under the respirator, or the specific change-out scheduled established for all chemical cartridge respirators, etc.).

NOTE: If there is NO End-of-Service-Life-Indicator (ESLI) (A system which warns the user of the approach of the end of adequate respiratory protection (i.e. the sorbent is approaching saturation or is no longer effective) appropriate for conditions in the employer's workplace, the facility has to implement a change schedule for canisters and cartridges which is based on objective information/data and will ensure the canisters and/or cartridges are changed before the end of their service life. This needs to be described in the Respirator Program including the information and data relied upon and the basis for the canister and cartridge change schedule and the basis for reliance on the data as per OSHA 29 CFR 1910.134 (d) (3) (iii) (B) (2).

- Instructions on Proper Care, Storage, and Maintenance of the Respirator.

- Instruction on "HOW" to inspect respirator and ensure the respirator is in proper working condition.

- Discussion; importance of Medical Surveillance/Air-Sampling Monitoring.

- Instruction on the method of FIT Testing and the proper way to conduct positive and negative pressure tests (fit checks) each time the respirator is donned; and

- "HOW" to recognize medical signs and symptoms which may limit or prevent the effective use of respirators; instruction on and practice use of emergency use/escape respirators available, where & when appropriate.

An OSHA training video on maintenance for the donning or doffing will be shown initially and annually thereafter.

EVALUATION OF PROGRAM EFFECTIVENESS:

The effectiveness of this program will be evaluated periodically through the following methods:

- Monthly housekeeping tours will include visual observations or correct use of respirators and inspections.

- The PA or designee will observe donning procedures, use of appropriate respirators, and validate adherence to chemical cartridge change-out schedule on a quarterly

basis. Findings will be documented, and department supervisors will be notified of the results and submit corrective actions to the PA or Safety Manager; and

- Supervisors shall monitor the use of respirators daily.

RECORDKEEPING REQUIREMENTS:

MEDICAL:

The Director of Safety or Safety Coordinator shall keep a record of all employees medically qualified or NOT medically qualified to wear Respiratory Protection. Medical Records shall be kept and maintained in accordance with AES 71.16 and all applicable HIPPA laws.

RESPIRATOR PROGRAM ADMINISTRATOR:

The Safety Division Program Administrators Matty Kernen (Director of Safety) and Tony Fisher (Safety Coordinator) shall ensure the training sessions, employee signatures, and training dates are documented and maintained. Additionally, the Administrators will assure FIT-Testing records and associated documentation are being maintained.

PROGRAM REVIEW, UPDATING, AND APPROVAL:

The Program Administrators shall review the Written Respiratory Protection Program on an annual basis. Updates shall be provided as needed, while changes in the program shall be approved by the Program Administrators.

EMPLOYEE USE FILTERING FACE-PIECE RESPIRATORS WHEN NOT REQUIRED BY THE STANDARD

Use of Respiratory Protection on a volunteer basis is authorized by the Program Administrator, or BCCI Construction Company. Unauthorized use of Respiratory Protection Devices is subject to the established BCCI Construction Company discipline process.

15.0 FALL PROTECTION PROGRAM

Title 8 California Code of Regulations (CCR), §1670 & 29 CFR 1926, Subpart M)

PERSONAL FALL ARREST, PEROSONAL FALL RESTRAINT, & POSITIONING DEVICES

The following fall protection program is provided as a guide to assist employers and employees in complying with the requirements of the Occupational Safety and Health Administration (OSHA) Fall Protection Standard (Ref: *29 CFR 1926, Subpart M*) AND Cal-OSHA (Ref: *Title 8, CCR, §1670)* in additional to providing other helpful information. This written program is NOT intended to supersede the requirements of any OSHA Standards.

BCCI will periodically review the Standards for any specific requirements which are applicable to our industry or situation and adjust the program which are specific to the company. BCCI will be required to add information which is deemed relevant to a particular building or project site to develop an effective and comprehensive written fall protection program. Currently, BCCI Construction, LLC is adhering to the Federal OSHA Standard of Fall Protection being required at any height above six (6) feet as this requirement more restrictive than the Cal-OSHA Standard of seven-and-half (7 ½) feet.

Each Trade Contractor WILL provide and install a Fall Protection System as required by OSHA 29 CFR, Subpart M pertaining to but not limited to: Guardrail Systems, Personal Fall Arrest Systems, Positioning Systems, Safety Monitoring Systems, Safety Net Systems, and Warning Line Systems. All employees who are exposed to a height of six (6) feet or more above the next lower level shall utilize Fall Protection. Fall protection can consist of various types of systems and equipment as listed above. Sub-Contractors are NOT AUTHORIZED to use BCCI Fall Protection Equipment under any circumstances.

Prior to the use of any Fall Protection System, the equipment or plan shall be carefully inspected or reviewed to ensure the employees are free from any potential fall hazardous conditions. All Fall Protection Equipment must be inspected prior to each use. Any piece of Fall Protection Equipment observed to have discrepancies/damage shall be immediately removed from service.

OBJECTIVE:

The objective of the BCCI Construction LLC Fall Protection Program is to identify and evaluate fall hazards, which will expose personnel, and provide specific training as required by Cal-OSHA and OSHA (Federal) Fall Protection Standards.

POLICY:

BCCI Construction LLC policy is to protect their personnel from occupational injuries by the implementation and enforcement of our Code of Safe Work Practices (Safety Manual) and with the appointment of a Competent Person(s) to manage and facilitate the company's Fall Protection Program. This program shall comply with the Cal-OSHA & OSHA (Federal) requirements. A copy of the OSHA Fall Protection Standard (29 CFR 1926, Subpart M) shall be made readily available to all employee(s) and may be obtained electronically through the company's Shared-Drive, ProCore, or through the Competent Person (Mr. Matty Kernen-Director of Safety and Tony Fisher-Safety Coordinator).

ASSIGNMENT of RESPONSIBILITY:

EMPLOYER:

BCCI Construction LLC has the responsibility to provide Fall Protection Training to all affected personnel and ensure all personnel understand and adhere to the procedures of this plan and follow the instructions of the Competent Person.

PROGRAM MANAGER:

The BCCI Construction LLC Director of Safety (Mr. Matty Kernen) has the responsibility as the Fall Protection Program Manager to implement this program by the following means:

- Perform Routine Safety Inspections of Work Operations.
- Enforce the BCCI Construction LLC Safety Policy & Procedures.
- Correct any Unsafe Practices or Conditions Immediately.
- Train personnel in the Recognition of Fall Hazards and the Proper Use of Fall
- Protection Systems.
- Maintain Records of Training, Equipment Issue, and Fall Protection Systems used at BCCI Construction LLC Job-Sites.
- Document and investigate all mishaps, incidents, and near-misses, which may result from the personnel being injured in fall with fall protection.

EMPLOYEES:

All personnel have the responsibility to:

- Adhere and Understand the procedures outlined in the written program.
- Follow all instructions of the Responsible Person.
- Alert management to any unsafe, hazardous conditions, or practices which may cause injury either to themselves or co-workers.
- Report any mishap which causes injury to an employee, regardless of the nature of the injury.

TRAINING:

- Any employee(s) which may be exposed to a fall hazard(s) are required to receive training on recognition of hazards, and the process on mitigation and minimization of exposure. Personnel shall receive training as soon as possible after acceptance of employment; and prior to performing any work in the areas to which a fall hazard(s) exist.

- A Training Record of personnel who have received this training and the date of training shall be maintained by the Director of Safety. The training of personnel by the Responsible Person shall include the following:
    - The Nature of the Fall Hazard(s) in which personnel may be exposed to.
    - Correct procedures for the erection, maintenance; disassembling, and inspection of all Fall Protection Systems to be used onsite.
    - The use and operation of Controlled Access Zone (CAZ), guard rails, Personal Fall Arrest Systems (PFAS), Safety Nets, Warning Lines, and Safety Monitoring Systems.
    - Role of each employee when the Safety Monitoring System is in use.
    - Limitations on the use of mechanical equipment when performing roof work (if applicable).
    - The correct procedures for equipment and material handling; to include storage and erection of overhead protection.
    - When & if used the role personnel in an Alternative Fall Protection Plan
    - What are the requirements of the OSHA Fall Protection Standard, *29 CFR 1926, Subpart M.*
    - The BCCI Construction LLC requirements for the reporting of mishaps which cause injury to an employee.

All Fall Protection training will be conducted on an annual basis prior to anniversary date of initial training, or as needed upon changes to processes, procedures, and environment. Additionally, when there are changes to the Fall Protection Program, Alternative Fall Protection Plan, or the OSHA Fall Protection Standard.

CONTROLLED ACCESS ZONES (CAZ) *29 CFR 1926.501(b)(9) & 1926.502(k)*:

- Controlled Access Zones (CAZs) shall be defined by control lines comprised of ropes, wires, tapes, or an equivalent material with supporting stanchions; and shall be:
    - Flagged at six (6) foot intervals with a High-Visibility Material.
    - Shall be rigged and supported so the line is between 30 to 50 inches (to include sag) from the walking/working surface.
    - Strong enough to sustain stress of at least 200 pounds.
    - Shall be extended the entire length of an unprotected/leading edge.
    - Shall be parallel to the unprotected/leading edge.

- Shall be connected on each side to a guardrail or wall.

- Shall be erected between six (6) and twenty-five (25) feet from unprotected edge; EXCEPTION only in the below listed scenarios:

EXCAVATIONS:

Fall Protection shall be provided to employee(s) who are working at the edge of an excavation which is six (6) feet or deeper. All employee(s) who are working in these areas are required to use the Fall Protection Systems designated within this written program.

- Any excavation(s) which are six (6) feet or deeper shall be protected by a guardrail system, fences, barricades, or coves.

- Any walkway which allows employee(s) to cross-over an excavation which is six (6) feet or deeper shall be equipped with guardrails.

FALL PROTECTION SYSTEMS

COVERS:

- All covers shall be secured to prevent any accidental displacement.

- Covers shall bear the marking “HOLE – DO NOT REMOVE.”

- Covers located in roadways shall be able to support twice the axel load of the largest vehicle which might cross over these covers.

- Covers shall also be able to support twice the weight of employee(s), equipment, and materials which might cross the covers.

GUARDRIL SYSTEMS (*29 CFR 1926.502 (b)*)

A guardrail system shall be erected at all unprotected edges, ramps, runways, or where holes are determined by a Responsible Person (RP) erecting systems will NOT cause an increased hazard(s) to employee(s). The below listed specifications will be followed in the erection of a guardrail system:

TOP RAILS

- A minimum of ¼ inch in diameter (Steel or Plastic Banding Unacceptable).

- High-Visibility Material shall be every six (6) feet when wire rope is used.

- RP will inspect frequently to ensure strength, stability, and integrity.

- Will be 42 inches (+ or – three inches) above walking/working level.

- Mid-rails, screens, mesh, intermediate vertical members, and solid panels shall be

erected in accordance with OSHA & Cal-OSHA Fall Protection Standard.

- Gates or removable guardrail sections shall be placed across the openings of hoisting areas and/or holes to prevent access to these areas, mitigating the hazard.

PERSONAL FALL ARREST SYSTEMS (PFAS) *29 CFR 1926.502 (d)*:

a. PFAS systems shall be issued to and used by the personnel as determined by the Responsible Person, which these systems may consist of anchorage, connectors, body harness, deceleration device, lifeline, or appropriate combinations. The PFAS systems shall:

    - Limit the Maximum Arresting Force to 1,800 pounds with Harness.

    - Be established so an employee cannot “Free-Fall” more than six (6) feet (1.8 meters); or contact the lower level.

    - Stop an employee and limit the maximum deceleration distance traveled to three and half feet (3 ½) or 1.07 meters.

    - Have enough strength to withstand twice the potential impact energy of an employee falling six (6) feet, the free fall distance permitted by the system, or whichever is less.

    - Inspect all equipment prior to each use for damage or deterioration.

    - Immediately remove equipment from service upon damage or deterioration.

b. All components of a fall arrest system must met the specifications of the OSHA Fall Protection Standard, Subpart M; and by utilized in accordance with the manufacturer’s instructions.

    - The use of Non-Locking Snap-hooks are PROHIBITED.

    - D-Rings and Locking Snap-Hooks Shall:

        - Minimal Tensile Strength of 5,000 Pounds.

        - Proof-Tested to Minimum Tensile Load of 3,600 Pounds, without Racking, Breaking, or Sustaining Permanent Deformation.

    - Lifelines Shall:

        - Designed, Installed, & Used under direction of the Responsible Person.

        - Protected against cuts and abrasions.

        - Equipped with Horizontal Lifeline Connection Devices capable of

locking both directions; (when used on suspended scaffolds or similar work platforms having horizontal lifelines, which may become vertical lifelines).

- Self-Retracting Lifelines/Lanyards:
  - Must have Ropes and Straps (Webbing) made of synthetic fibers.
  - Minimal Tensile Load of 3,600 pounds; if the limit free fall distance to two (2) feet.
  - Minimal Tensile Load of 5,000 pounds; (e.g., Rip-stich, Tearing, and Deforming Lanyards.)
- Anchorages:
  - Must Support Minimum of 5,000 pound per person attached.
  - Designed, Installed, & used under the direction of Responsible Person
  - Capable of supporting twice the weight expected/imposed.
  - Independent of any anchorage used to support/suspend platforms.

POSITIONING DEVICE SYSTEMS (*29 CFR 1926.502 (e)*)

A Body Harness System(s) shall be set-up so personnel can free fall NO farther than two (2) feet and shall be secured to an anchorage capable of supporting twice the potential impact load or 3,000 pounds, whichever is greater.

NOTE: the requirements for snap-hooks, d-rings, and other components are the same as detailed in the program listed under the Personal Fall Arrest Systems.

SAFETY MONITORING SYSTEMS *(29 CFR 1926.502 (h)*)

In situations/scenarios when NO other fall protection systems have been implemented the Responsible Person shall monitor the safety of employee(s) performing work in these areas.

The Responsible Person:

1) Competent in the Recognition of Fall Hazards.
2) Capable of Warning Employee(s) of Fall Hazard Dangers.
3) Operate on same walking/working surface as employee(s) & see them.
4) Close to Operations to Communicate with Employee(s) Orally.
5) Free of Other Job-Duties, which might distract from Monitoring Function.

No employee(s) other than those engaged in the work being performed under this system (Safety Monitoring System) will be allowed in the work area. All employee(s) working under the Safety Monitoring System are required to comply with the fall hazard warnings of the Responsible Person.

SAFETY NET SYSTEMS

- Safety Net Systems must be installed NO more than 30 feet below the walking/working surface with sufficient clearance to prevent contact with the surface below; and shall be installed with sufficient vertical and horizontal distances as described in the OSHA Fall Protection Standard, Subpart M.

- All nets shall be inspected a minimum of once a week for wear, damage, or deterioration by the Responsible Person. Defective nets will be removed from service immediately and replaced with acceptable nets.

- All nets shall follow mesh, mesh crossing, border rope, and connection specifications as described in the OSHA Fall Protection Standard, *29 CFR 1926.105 (d), Subpart M*.

- When nets are used on bridges, the potential fall area from the walking/working surface shall remain unobstructed. *29 CFR 1926,106 (a) – (d), Subpart M*.

- Objects which may or have fallen into the safety nets shall be removed as soon as possible or prior to the next working shift.

WARNING LINE SYSTEMS

A warning line system(s) consisting of supporting stanchions and ropes, wires, or chains shall be erected around all sides of roof work areas.

- All lines shall be flagged at NO more than intervals of six (6) feet with high visibility materials.

- The lowest point of the line to include sag shall be between 34 and 39 inches from the walking or working surface.

- All stanchions of the warning line systems shall be capable of resisting at least 16 pounds of force.

- Minimal Tensile Strength of 500 pounds for Ropes, Wires, or Chains.

- Warning line shall be erected a minimum of six (6) feet from the edge.
- EXCEPTION: In an area where mechanical equipment is in t use; therefore, the warning line shall be erected at least six (6) feet from parallel edge and at least ten (10) feet from perpendicular edge.

TASK AND WORK AREA REQUIRING FALL PROTECTION

Unless otherwise specified; the Responsible Person(s) shall evaluate the worksite(s) and determine what specific type(s) of Fall Protection is to be used in the following situation(s) / scenario(s):

HOIST AREAS

A Guardrail system or Personal Fall Arrest system (PFAS) will be used in hoist areas when employee(s) may fall six (6) feet or more. When the Guardrail System must be removed for hoisting; employee(s) are required to use a PFAS System and notify the on-site Superintendent prior to removal of the Guardrail System.

HOLES

Covers and/or Guardrail system(s) shall be erected around the hole(s); including skylights which are six (6) feet or more above any lower level. When the Guardrail system and/or covers must be removed; employee(s) are required to use a PFAS System and notify the on-site Superintendent prior to removal of the Guardrail and/or Cover system(s).

LEADING EDGES

Guardrail, safety net, or Personal Fall Arrest Systems (PFAS) shall be used when employees are constructing a leading edge which is six (6) feet or more above a lower level(s). If the Responsible Person determines the implementation of a conventional fall protection system is NOT feasible or creates a greater hazard to employee(s); then an alternative Fall Protection Plan will be implemented. The Alternative Fall Protection Plan for any/all work on leading edges will:

- Be a Written Job-Site Specific Plan.
- Explain How the Conventional Fall Protection Plan is NOT Feasible and creates a hazard to personnel.
- Explain What the Alternative Fall Protection will be used for each task.
- Be Maintained in Writing by the Responsible Person at the Jobsite.
- Meet the Requirements of *29 CFR 1926.502(k)*.

ROOF:

- Low-Slope Roof: Fall Protection shall be provided to employee(s) engaged in roofing activities on low-slope roofs with unprotected sides and edges six (6) feet or more above lower levels. The type(s) of Fall Protection needed shall be determined by the Responsible Person, and may consist of a guardrail system, safety net system, Personal Fall Arrest System (PFAS), or a combination of a Warning Line and Safety Net System, Warning Line and Personal Fall Arrest System (PFAS), or Warning Line and Safety Monitoring

System. Any roof 50 feet or less in width, the use of a Safety Monitoring System without a Warning Line System is permitted.

- Steep Roof: A Guardrail System with toe-boards, Safety Net Systems, or Personal Fall Arrest Systems (PFAS) will be provided to employee(s) working on a steep roof with unprotected sides or edges six (6) feet or more above lower levels, as determined by the Responsible Person.

WALL OPENINGS

Guardrail, Safety Net, or Personal Fall Arrest Systems (PFAS) will be provided to personnel working on, at, above, or near wall openings when the outside bottom edge of the wall opening is six (6) feet or more above lower levels, and the inside bottom edge of the wall opening is less than 39 inches above the walking and/or working surface. The specific type of Fall Protection to be used shall be determined by the Responsible Person.

RAMPS, RUNWAYS, and OTHER WALKWAYS

Employee(s) utilizing ramps, runways, and other walkways six (6) feet or more above the lower level shall be protected by a guardrail system.

PROTECTION FROM FALLING OBJECTS (*29 CFR 1926.502(j)*)

When a guardrail system is in use; the openings shall be small enough to prevent the potential passage of falling objects. The following procedures must be followed by all personnel to prevent the hazards associated with falling object(s):

- No materials shall be stored within six (6) feet of working edges.
- Excess debris shall be removed immediately to keep area of work clear.
- During Roofing work, materials and equipment shall be stored no less than six (6) feet from the roof edge unless guardrail are erected at the edge.
- Stack materials must be stable and self-supporting.
- Canopies shall be strong enough to prevent penetration of falling objects.
- Equipment shall NOT be piled higher than the toe-board, unless a sufficient panel or screening have been erected above the toe-board.
- Toe-boards erected along the edges of overhead walking/working surfaces shall:
    - Capable of withstanding a force of at least 50 pounds; and
    - Solid; minimum of 3.5 inches in height and no more than one quarter inch clearance above the walking/working surface.

MISHAP INVESTIGATIONS

All near-misses and mishaps which result in an injury to any employee(s); regardless of the nature, shall be reported immediately; then investigated by a Responsible Person immediately to determine the root cause and make plausible recommendations based on the findings to prevent this mishap from recurring.

In the event of such an event, the Fall Protection Program or Fall Protection Plan; if in place, shall be re-evaluated by the Responsible Person to determine if any additional practices, procedures, or training are required to prevent the recurrence of similar and future mishaps or near-misses.

The Fall Protection Program or Alternative Plan shall be reviewed at minimum annually; and any changes to these program(s) or plan(s) shall be approved by the Responsible Person. Additionally, the changes should be reviewed by a Qualified Person during job progression to evaluate and determine if additional practices, procedures, or training needs or are required to prevent fall injuries.

All affected personnel shall be notified of all procedural changes and trained when required on said changes. A current copy of this program or plan shall be always maintained electronically or hard copy; in addition, the Responsible Person must maintain a current copy. These items shall be readily available and present to inspectors or outside agencies immediately upon request.

GLOSSARY OF TERMS:

Anchorage – A secure point of attachment for Lifelines, Lanyards, or Deceleration Device

Body Harness – Straps which may be secured about an employee(s) in such a manner to distribute the Fall-Arrest forces over at least their thighs, pelvis, waist, chest, and shoulders; with a means for attaching the harness to other components of a Personal Fall Arrest System (PFAS).

Connector – A device used to couple (connect) parts of a Personal Fall Arrest System (PFAS) or Positioning Device System (PDS) together.

Controlled Access Zone (CAZ) – A Work Area designed and clearly marked for which certain types of work may take place without the use of conventional fall protection systems (e.g., guardrail, personal arrest, or safety nets) to protect employees working within the zone.

Deceleration Device – A mechanism (e.g., rope grab, rip-stich, specially-woven, tearing, deforming lanyards, or self-retracting lifeline/lanyard); which serves to dissipate a substantial amount of energy during a fall arrest or otherwise limit the energy imposed on the employee(s) during a fall arrest.

Deceleration Distance – The additional vertical distance a falling person travels excluding the lifeline elongation and free fall distance; before stopping, from the point at which a deceleration device deigns to operate.

Guardrail System – A Barrier erected to prevent employee(s) from falling to a lower level.

Hole – A Void or Gap two (2) inches (5.1 centimeters) or more in the least dimension located in a floor, roof, or other walking/working surface.

Lanyard – A Flexible Line of rope, wire rope, or strap which generally has a connector at each end for connecting the body harness to a type of deceleration device, lifeline, or anchorage.

Leading Edge – The edge of the floor, roof, or formwork for a floor or other walking/working surface (e.g., deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed.

Lifeline – A Component consisting of a flexible line for connection to an anchorage at one end to hang vertically (Vertical Lifeline) or for connection to anchorages at both ends to stretch horizontally (Horizontal Lifeline), which serves as a means for connecting other components of a Personal Fall Arrest System to an anchorage.

Opening – A Gap or Void of 30 inches (76 centimeters) or higher of 18 inches (46 centimeters) or wider, in a wall or partition through which employee(s) can fall to a lower level.

Personal Fall Arrest System (PFAS) – A System including but NOT limited to and anchorage, connectors, and a body harness used to arrest and employee(s) in a fall from a working level.

Positioning Device System (PDS) – A Body Harness system rigged to allow an employee(s) to be supported on an elevate vertical surface (e.g., wall) and be able to work with both hands free while leaning backwards.

Rope Grab – A Deceleration Device which travels on a lifeline an automatically; by friction, engages the lifeline and locks to arrest the fall.

Safety Monitoring System (SMS) – A Safety System which a Competent Person is responsible for recognizing and warning employee(s) of the fall hazards.

Self-Retracting Lifeline / Lanyard – A Deceleration Device containing a drum-wound line which can be slowly extracted from or retracted onto the drum under minimal tension during normal employee(s) movement and which, at the onset of a fall will automatically lock the drum and prevent or arrest the fall.

Snaphook – A Connector consisting of a hook-shaped member with a normal closed keeper or similar arrangement, which may be opened allowing the hook to receive an object; and when released automatically closes to retain the object.

Toeboard – A Low Protective Barrier which prevents material and equipment from falling to the lower levels and aides in the protection of personnel from falling.

Unprotected Sides & Edges – Any side or edge (except at entrances of points of access) of a walking or working surfaces (e.g., floor, roof, ramp, or runway) where there is NO wall or guardrail system at 39 inches (1 meter) in height.

Walking or Working Surfaces – Any surface whether horizontal or vertical; on which an employee(s) walks or works, including but NOT limited to floors, roofs, ramps, bridges, runways, formwork, and concrete reinforcing steel. This DOES NOT include ladders, vehicles, or trailers to which employee(s) must be located to perform their duties.

Warning Line System – A Barrier erected on the roof to warn employee(s) they are approaching an unprotected roof side or edge. This designates an area in which roofing work may take place without the use of guardrail, body harness, or safety net system may protect employee(s) in this area.

WRITTEN SITE-SPECIFIC FALL PROTECTION PLAN

Planning plays a critical role in the protection of employee(s) from fall hazards. This Fall Protection Template can assist in the planning process. This aide ensure the Fall Protection Plans are designed to address Site-Specific conditions and comply with all standards, regulations, and directives relating to Fall Protection.

GENERAL INFORMATION					
Activity/Command:				**Date:**	
Building/Facility #:				**Work Area:**	
Survey Conducted By:				**Approved By:**	
Fall-Hazard # (1, 2, 3, etc.)			**FP Program Manager or Competent Person:**		
SURVEY INFORMATION					
Major Fall-Hazard Zone or Type:			Work Location:		
Personnel Interviewed:	1.		Guiding Regs:		
	2.		Work Type:		
	3.				
Distance of Personnel from Fall-Hazard (Ft):			Location or Distance to Obstructions (Ft)?		
Suggested Anchorage(s) (if fall-arrest system utilized):					
Distance to Ground Below (Ft):		Number of Personnel Exposed to Fall-Hazard:			
Frequency/Duration of Fall Exposure:	/		Exposure Risk:		
Potential Severity of Fall:			Obstructions in Fall Path:		
Access or Egress to Fall-Hazard Area (i.e. ladder, AWP, Stairs, etc.)			Condition of Floor/Other Surfaces:		
Historical Fall Mishaps at the Facility?			Lock Out/Tag Out Hazard?		
Is There a Risk of the Following?			Suggested Fall Protection Solutions		
Hot Objects:	☐		Guardrails		
Sparks:	☐		FA Type:	Horizontal Life-Line	☐
				Portable System	☐
				Overhead Beam Strap	☐
Flames:	☐			Self-Retracting Lanyard	☐
				Energy Absorbing Lanyard	☐
Chemical Hazards:	☐		Maintenance Stand or work platforms		☐
Electrical Hazards:	☐		Restraint System		☐
Sharp Objects:	☐		Positioning System		☐
Abrasive Surfaces:	☐		Aerial Lift/Work Platforms		☐
Weather Factor:	☐		Horizontal or Single Anchor Vertical Lifeline System		
Other risk Factors:	☐		Other FP methods		
Anchorage(s) Locations (if Applicable)					
Can Rescue Be Performed if Required?			Type of Rescue:		
Is there a rescue plan prepared?			Explain Other:		
Are End-users Trained on Fall-arrest Systems?			Do Swing Fall-Hazards Exist?		
Additional Information					

FALL RESCUE PLAN

Task Being Performed:	
What Height is Work Being Performed at:	
Notification: (Event of an Arrest): ☐ Crew Member / Co-Worker ☐ Superintendent ☐ Sub-Contractor ☐ Local Emergency Services	**Communication:** ☐ Direct Voice ☐ Whistle ☐ Radio / Cellular Phone ☐ Other: _____
Equipment Required: ☐ Suspension Trauma Straps ☐ Ladder ☐ Retrieval Block ☐ Man-Lift / Electric Work Platform ☐ Mobile Crane ☐ Local Emergency Services	**Type of Rescue:** ☐ Self-Rescue (*Climb Onto Platform / Man-Lift*) ☐ Basic Rescue (*Fell Out of Man-Lift; Lower Lift or Fell Into Shaft; Utilize Retrieval Block*) ☐ Complex Rescue (*Fall from Large Scaffold in a Remote Location(s)*)
Details of a Complex Rescue:	

NOTE: ONCE A FALL IS ARRESTED; IT IS CRUCIAL FOR A PROMPT RESCUE AS A SUSPENSION TRAUMA INJURY MAY OCCUR IN A SHORT PERIOD OF TIME

Reviewed by Personnel Involved? ☐ YES ☐ NO **Names of Personnel Involved in Task:** **1.** **2.** **3.** **4.** **5.** **6.**	**Approval by Superintendent:** ☐ YES ☐ NO **NAME: _____** **SIGNATURE: _____** **DATE: _____**

GUARDRAIL DISPRUTION PERMIT

GUARDRAIL DISRUPTION PERMIT	
Job Number:	**Floor:**
Job Name:	**Superintendent:**
Job Address:	**City:**
Requested Date/Time of Disruption:	**Sub-Contractor Requesting Permit:**
Anticipated Date/Time Completion:	**Foreman Requesting Permit:**
Anticipated Duration of Disruption:	**Date Approved (Print):**
Approved By:	**Date Closed:**
Anyone needing to alter or remove any part of any guardrail system **MUST OBTAIN AUTHORIZATION FROM BCCI SUPERINTENDENT**. There is a ***ZERO TOLERANCE POLICY*** and will result in ***REMOVAL*** from the JOB-SITE.	
Purpose for removing, altering, or changing the Guardrail System:	
Location of the Guardrail System to be adjusted:	
Elevation: ☐ North ☐ South ☐ East ☐ West	
Column Line Coordinates:	
Name of Sub-Contractor Competent Person who is trained & competent in the provisions of support in *29 CFR 1926.502*:	
Identify Appropriate Anchorage Point:	
Check the boxes which apply and complete separate checklist forms:	
Beam Clamp ☐ Beam Strap ☐ Lanyard ☐ Harness ☐ Self-Retractable ☐	
Anyone removing, repairing, or replacing the guardrail system must be fall protected the entire time by wearing a full body harness with proper anchorage **prior to** entering the exposed area. Before the guardrail system is removed, fall protection for all other workers in the area must be provided by a hard barricade or established by **control line system** using **Red Danger Tape** at least **15 feet** back from the exposed side or edge.	
What type of alternative temporary fall protection or warning line system is provided by sub-contractor?	
Garlock System ☐ Wooden Guardrail System ☐ Danger Line System ☐ Other ☐	
Once the disruption is completed; the guardrail system must be re-installed and inspected by the sub-contractor competent person:	
Name of Sub-Contractor Competent Person who inspected the re-installed guardrail:	
Print Name:	**Signature:**
Review Date:	**Reviewed By:**

16.0 MATERIAL HANDLING & MOBILE ELEVATED WORKING PLATFORM (MEWP)

PROGRAM DESCRIPTION

Mobile Elevating Work Platforms (MEWPs) such as scissor lifts, vertical lifts, boom lifts, and aerial bucket trucks, are used throughout our projects and operated by personnel and trades. BCCI Construction, LLC recognizes there are several potential hazards associated with the use of these Mobile Elevating Work Platforms (MEWPs).

This program is based on the American National Standards Institute (ANSI) and the Scaffold Industry Association (SIA) Standards and is designed to ensure Mobile Elevating Work Platforms (MEWPs) are operated in a safe and consistent manner through a system of safety checks and accountability.

SCOPE

This program applies to all BCCI owned or rented equipment designed to elevate personnel on a platform which is propelled by a powered lifting device, with the controls located on the platform itself. It applies to field and laborer divisions own the equipment and the personnel who utilize them. (e.g., Mobile Elevating Work Platforms (MEWPs) include vertical lifts, scissor lifts, boom lifts, and aerial bucket trucks).

DEFINITIONS

Anchorage – A secure point of attachment for fall protection equipment. ANSI/SIA – American National Standards Institute/Scaffold Industry Association. Boom – A straight or articulated beam that supports the work platform.

Boom Lift – A mobile, self-propelled boom supported work platform that can be raised or lowered vertically or extended and retracted horizontally and pivoted around a supporting base.

Cal/OSHA – California Occupational Safety and Health Administration.

Mobile Elevating Work Platforms (MEWPs) – A mobile device that has an adjustable position platform supported from ground level by a structure.

Lower Controls – Controls located on the base of the MEWP that can control the functions of the lift platform.

Operator – The trained and authorized person who controls the movement of an aerial platform. This could include any employee or subcontractor using a Mobile Elevating Work Platforms (MEWPs) owned or rented.

Outriggers – Devices which increase the stability of the Mobile Elevating Work Platforms (MEWPs) and can lift and leveling the work platform base.

Owner – Personnel or trades who have possession of a work platform. Owners are responsible for conducting maintenance inspections and ensuring operators are trained and authorized to use the equipment.

Platform – The part of the Mobile Elevating Work platform designed for occupancy by personnel with their necessary tools and materials.

Rated Load Capacity – The safe maximum carrying capacity of the work platform. This would include the evenly distributed weight of the occupants plus all tools or materials on the platform.

Scissor Lift – Mobile, self-propelled work platform which can only be raised or lowered vertically from the base.

Stabilizers – Devices which can increase the stability of a Mobile Elevating Work Platforms (MEWPs) but are not capable of lifting or leveling the platform.

Upper controls – Controls located on the platform or bucket of the MEWP and the operator uses to control the movement of the lift.

User – Personnel who have care, control, and custody of the MEWP. This person or entity may also be the employer of the operator, an owner, or lessee.

Vertical Lift – A personnel lift consisting of a work platform normally for one occupant attached to a vertically extending mast mounted on a mobile base. Equipment models can be self-propelled or manually propelled.

RESPONSIBILITIES

Responsibilities Upon Purchase Upon the purchase or rental of a Mobile Elevating Work Platforms (MEWPs), the department shall:

- Ensure the operating and maintenance manuals have been received.
- Acquire repair and parts manuals within 60 days of acquisition.

Have all lift operators review the operating manual, complete, and sign the “Operator’s Manual Acknowledgment Form” (Appendix A) and return it to their supervisor for documentation. Ensure copies of the operating and maintenance manuals are placed on the MEWP in a weatherproof compartment.

Perform an Initial Inspection (Frequent Inspection) as specified in this program prior to placing the MEWP in service. BCCI Constructions requires all personnel and to trades to have a daily inspection sign-off affixed to their MEWP and completed prior to use.

MAINTENANCE, INSPECTION AND REPAIR

Maintenance: The warehouse is responsible for each Mobile Elevating Work Platforms (MEWPs) BCCI owns shall arrange for maintenance tour lifts and coordinate with the rental company for the lifts BCCI rents for the project. All other lifts not under BCCI (Trades mainly) are responsible for their own care and maintenance. A preventive maintenance program based on the manufacturer’s recommendations shall be developed by the warehouse for BCCI MEWPS, which includes the environment and the frequency of use.

Inspection: The warehouse shall ensure the pre-operation, frequent, and annual inspections, are being performed on the MEWPs which are NOT in-use; however, it is the Laborer Foreman's responsibility to perform the daily inspection while the MEWPs are on the project.

Repair: When safety related items have been discovered, the lift shall be placed out of service until the item(s) has been repaired. All replacement parts or components being replaced shall be identical to or equivalent to the original parts based on information provided by the manufacturer or supplier.

RECORDS RETENTION

The warehouse superintendent shall date and retain the following records for each Mobile Elevating Work Platforms (MEWPs) they own:

- Serial number and date of purchase (this shall be kept for as long as the department owns the lift.
- Written records of the frequent and annual inspections and repairs performed. This shall include deficiencies found, corrective actions taken and the identification of the person(s) who performed the inspection and repairs.
- Written records of repairs made on the lift.
- Training records for any employees trained in the maintenance of the Mobile Elevating Work Platforms (MEWPs).
- Each department shall date and retain the records for each Mobile Elevating Work Platforms (MEWPs) for at least the time prescribed in the following table:

	Scissor Lift	Boom or Manlift
Frequent, Initial, Annual Inspections and Repairs	Duration of Ownership	Duration of Ownership
Lift Operator Training Records	Four Years	Four Years

EMPLOYEES

Since we (BCCI) as the user has direct control over the operation of the Mobile Elevating Work Platforms (MEWPs), conformance with good safety practices in this area is the responsibility of the user and operating personnel.

Decisions on the use and operation of the lift shall be made with the understanding the platform will be carrying personnel whose safety is dependent on those decisions. (Department Manager or Supervisor(s) shall be trained and knowledgeable on the MEWP even if they do not operate the MEWP).

- Employees who operate Mobile Elevating Work Platforms (MEWPs) shall be knowledgeable of the following:
    - The manufacturer's operating instructions.

- Pre-operation inspection of the lift.
- Function testing, setup, and operation of the lift.
- Inspection of the work area for dangerous conditions (e.g., uneven surfaces, overhead obstructions power lines), or other hazards.
- Setting up of barricades or warning lines to protect pedestrians, clients, architects, and trades from overhead work hazards.
- Load capacities of the equipment.
- How to safely move the equipment.
- Prevention of falls and the use appropriate fall protection and other appropriate Personal Protective Equipment.

MANUALS

Operators of Mobile Elevating Work Platforms (MEWPs) must acknowledge they have reviewed the operator's manual for the lifts they use. The operator is expected to know and understand the following information about the MEWP they operate prior to initial operation of the lift:

- The operation, control features, placard warnings, and safety devices of the lift
- Where to locate the user manual and who can operate or use the lift.

If the operator does not understand any of the above items, they shall consult with their supervisor prior to using the MEWP.

INSPECTION AND MAINTENANCE

Users shall inspect and maintain the Mobile Elevating Work Platforms (MEWPs) as required by their department to ensure proper operation.

NOTE: Some personnel may be approved by their department to operate the lift, but not to perform maintenance on the MEWP.

All operators shall perform pre-operation inspections prior to each use of the lift and document on the inspection sheet attached to the MEWP. All MEWPs NOT in proper operating condition shall be immediately removed from service and reported to warehouse. Only personnel who are authorized by the warehouse may perform maintenance duties on the lifts.

WORKPLACE INSPECTIONS

Prior to setting up the lift at each new location the operator shall conduct a workplace inspection to identify potential hazards. Appropriate barricades or warning lines will be placed to protect all pedestrians or other unauthorized individuals from potential overhead hazards.

TRAINING

Only trained and authorized personnel may operate MEWPs. For maintenance, only employees who have been trained on maintenance operations for specific lifts may perform these duties.

- SAFETY DIVISION:
    - Shall develop an MEWP platform program and revise when necessary.
    - Shall provide for the training of operators and users of MEWPs upon request by warehouse and ensure training records are maintained.
    - Shall provide technical support to warehouse and personnel when questions or concerns arise with regards to MEWPs safety.
    - Shall perform periodic review and audits of MEWP operations to ensure BCCI procedures are enforced and safe work practices used.

PROGRAM COMPONENTS

GENERAL GUIDELINES

To ensure safe practices, the following general procedures are followed when a trained operator uses a Mobile Elevating Work Platforms (MEWPs):

- Obtain any necessary authorization for use of the lift.
- Perform a Pre-operation inspection on the lift and workplace inspection.
- Mark or barricade work area to ensure no unauthorized entry into the work area.
- Ensure guardrails are installed and are in place.
- Ensure load being is placed on the lift is within the rated capacity of the lift.
- Test the upper and lower controls of the lift.
- Ensure all personnel on the lift are using the appropriate fall protection equipment & have been trained and authorized to operate or work on the platform.
- No contractor will be permitted to use a BCCI owned MEWPs.

No MEWPs will be “field modified” other than those intended by the manufacturer unless:

- The manufacturer certifies the modification in writing.
- Any other equivalent entity, such as a nationally recognized testing lab, certifies the MEWPs modification conforms to all applicable provisions of *ANSI A92.2-2009*. The lift must be as safe as the equipment was prior to modification.

- All contractors will need to provide their own equipment for use.

INSPECTIONS

The inspection process is a crucial step in preventing MEWPs incidents which are caused from faulty or worn-out equipment. MEWPs NOT in proper operating condition shall be immediately removed from service until the problems have been corrected by an authorized and trained maintenance technician.

PRE-OPERATION INSPECTION

A pre-operation Inspection and Function Test must be performed by the operator & documented by personnel. The inspection must be completed in accordance with the manufacturer operator manual and shall include at least the following:

- Copies of Operator's Manual & ANSI/SIA Manual of Responsibilities are stored on the lift and annual inspection has been performed within the previous 13 months.
- Operating & emergency controls, Safety & Personal Protective Devices.
- Air, hydraulic, fuel system leaks, cables & wiring harness, loose, or missing parts.
- Tires & wheels, placards, warnings, & control markings, outriggers, & stabilizers.
- Guardrail system & other items specified by the manufacturer.

FREQUENT INSPECTION (INITIAL INSPECTION)

Any time an MEWPs has NOT been used for a period of 3 months or more, or when the lift is first acquired, a frequent inspection shall be performed by a qualified person and shall include the following:

- All functions and their controls for speed(s) smoothness, and limits of motion.
- Lower controls including the provisions for overriding of upper controls.
- All chain and cable mechanisms for adjustment wear or damaged parts.
- All emergency and safety devices.
- Lubrication of all moving parts, inspection of filter element(s), hydraulic oil, engine oil, and coolant as specified by the manufacturer.
- Visual inspection of structural components and other critical components (e.g., fasteners, pins, shafts and locking devices).
- Placard, warnings, and control markings.

ADDITIONAL ITEMS SPECIFIED BY THE MANUFACTURER

ANNUAL INSPECTION

An annual inspection shall be performed on each MEWP at least every 13 months. The inspection shall be performed by a qualified mechanic who is authorized to perform maintenance duties on the lift. The inspection shall include all items specified by the manufacturer for an annual inspection.

WORKPLACE INSPECTION

Before a Mobile Elevating Work Platforms (MEWPs) is used and during its use, the operator shall inspect the work area in accordance with the lift manufacturer operator's manual for possible hazards including, but not limited to:

- Drop-offs, holes, slopes, bumps, and floor obstructions.
- Debris, overhead obstructions, and energized power lines.
- Hazardous locations and atmospheres.
- Inadequate surface & support to withstand all load forces imposed by the MEWP.
- Wind & weather conditions or other possible unsafe conditions.
- Protection of trades, personnel, clients, architects, etc.

FALL PROTECTION

The use of fall protection is required if the manufacturer has designed their MEWP with rated tie-off points. During the operation of boom lifts the use of a Personal Fall Arrest System, is required. A Rescue Plan shall be in place in case the MEWP gets stuck or will not operate or an employee may fall and be hanging from their harness and lanyard.

WORKING AROUND POWER LINES

In general, scissor lifts are not electrically insulated and will NOT provide protection from contact with or in proximity to electrical current, power lines, or exposed bus bars. Any MEWP intended for use around electrically energized circuits shall meet the electrical requirements of American National Safety Institute/Scaffold Industry Association (*ANSI/SIA A92.2-2001*), "V*ehicle-Mounted Elevating and Rotating Aerial Devices.*" Refer to the manufacturer operator's manual and identification plate affixed to the machine for the category of insulating aerial device, if applicable.

Operators shall maintain safe distances from ALL electrical power lines, electrical current, exposed bus bars, and apparatus in accordance with governmental regulations and the Minimum Safe Approach Distance (MSAD) chart.

Voltage Range (Phase to Phase)	Minimum Safe Approach Distance	
	(Feet)	(Meters)
0 to 300V	AVOID CONTACT	
Over 300 to 50KV	10	3.05
Over 50KV to 200KV	15	4.60
Over 200KV to 350KV	20	6.10
Over 350KV to 500KV	25	7.62
Over 500KV to 750KV	35	10.67
Over 750KV to 1000KV	45	13.72

REPORTING REQUIREMENTS

Constant awareness & respect for MEWPs, equipment, and compliance with all applicable BCCI Construction, LLC safety requirements is mandatory. Supervisors and Safety Division personnel may issue warnings and implement disciplinary actions for failure to follow the guidelines set forth in this program. All personnel are empowered to report any safety concerns to their Supervisor or Safety Division.

REFERENCES

TRAINING REQUIREMENTS

All personnel operating MEWPs must have initial training prior to using the equipment. Initial training is provided by Safety Division authorized trainers and will include classroom instruction and familiarization on specific operating characteristics of aerial lift equipment.

- The contents of the training will include the following:
    - Purpose and use of operator's manuals.
    - Requirements for annual and periodic inspections.
    - Pre-operation inspections, function tests, identification of malfunctions or problems.
    - Factors affecting stability, purpose of placards and decals.
    - Workplace inspections, identification of hazards.
    - Safety rules & regulations, operator warnings & instructions.
    - Authorization to operate with evaluation completed.

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Title 8 California Code of Regulations, General Industry Safety Orders - §3299, §3636, §3637, §3638, §3639, §3640, §3642, §3643, §3645, §3646, §3648

29 CFR 1910, Subpart F, *"Powered Platforms, Manlifts, and Vehicle-Mounted Work Platforms,"* 1910.66, 1910.67, 1910.68

29 CFR 1926, Subpart L, *"Scaffolds," 1926.450, 1926.453, 1926.454*

ANSI/SIA A92.2-2009, *Vehicle-Mounted Elevating and Rotating Aerial Devices*

ANSI/SIA A92.3-2006, *American National Standard for Manually Propelled Elevating Aerial Platforms*

ANSI/SIA A92.5-2006, *American National Standard Boom-Supported Elevating Work Platforms*

17.0 HEALTHCARE

An Infectious Control Risk Assessment (ICRA) is a system used within the Healthcare System and Facilities to aid in the reduction of the risk of the effects construction projects impact patients in a clinic, hospital, medical facility, etc. The Project Team of Healthcare Projects shall be engaged with the Construction Manager both in the field and project management, which involves the planning, implementation, and sustainment of the ICRA plan. These plans are developed by the owner and assure the accepted procedures are executed by all project personnel, which includes our sub-contractors and trades.

Per the Guidelines for Design and Construction of Hospital and Healthcare Facilities of the American Institute of Architects, the Infection Control Risk Assessment (ICRA) must be a part of every healthcare construction project. An ICRA Plan should address the minimum:

- Impact of Disrupting Essential Services to the Patients and Employees.
- Patient Placement and / or Relocation.
- Effective Barriers to Protect Susceptible Patients from Airborne Dust Contaminants (e.g., aspergillus' species).
- Air Handling and Ventilation needs in Surgical Service and other Key Areas.
- Domestic Water System to Limit Legionella or Waterborne Opportunistic Pathogens.
- Protection of Patients from Demolition, Ventilation, and Water Intrusion following Power Outages, Movement of Debris, Traffic Flow, Clean-Up, and Certification.

The development of the ICRA Plan begins at the early design phase and planning stages of any project. The overall responsibility for the ICRA rests with the owner of the facility. One of the ways an owner can assure each project has a well thought our plan is to assemble a team with the infection control practitioner, project designer, safety, facility managers, and the construction manager. The assembled team then addresses the impact the construction project will have on the patient population. The owner is responsible to direct BCCI Construction, LLC on the implementation of this vital protection program.

This Owner owned and developed ICRA Plan is a living document and is updated throughout each phase of the project. During actual construction, the team should meet on a regular basis to update the ICRA Plan and assess the risk as the progress of construction. The same approach is undertaken during the development and to assure success of this specific plan.

During construction and renovation projects, risk managers have a primary concern, which is Fire Prevention, with a secondary emphasis for general safety and exposure to chemicals. However, an area overlooked is in the threat to air pollution. In a hospital or other healthcare environments, where patients have a compromised immune system leaving them more susceptible to infection the result could be of dire consequences. Construction procedures can heighten the risk of infection within healthcare environments by demolition with inadequate barriers, exterior wall removal, core drilling, water leakage, mold growth, poor ventilation, etc. will increase the risk.

No Building under construction or renovation is immune to hazardous conditions to include air pollution. Therefore, risk management is important and avoiding hazardous conditions requires a formal approach during pre-construction to aid in the mitigation or elimination of the hazards. The development of the plan is dependent on the building and scope of work. While in healthcare, the ICRA Plan considers the patient and procedures affected, to include sterile supply, laundry services, loading dock, air intakes, and other factors which may impact the risk to patients.

All project related to healthcare; the risks of construction induced infection shall be assessed. During the risk assessment consider the following:

- Patient Population.
- Extent and Duration of the Project.
- Impact the Project will have on Mechanical Systems.
- Will the Space Remain Occupied during the Project.

The risk assessment should begin at the concept / planning phase, when the scope, location, equipment size, etc. are determined. Consideration shall be given to the internal and external impacts of the project during design and coinciding logistics and space planning. During the bidding process, value-engineered decisions must be carefully examined regarding the potential for fungal growth and indoor air quality issues or concerns. Although preventative maintenance may arise from a risk assessment may be costly, it often is substantially less so than problems related to building acceptance and litigation over water-damage issues or concerns. During the implementation phase of the project, demolition, renovation, clean-up, etc. problems can be minimized in part by providing break areas and restroom facilities for workers.

Commissioning criteria should include the prevention of the installation of water-damaged materials, as well as predetermined ventilation parameters. Identify and communicate the responsibility for monitoring including infection control concerns and risks. The ICRA Plan may be modified throughout the entire phasing of the project. Revisions must be communicated with the project team and all other members of the project to assure compliance.

The following is an ICRA Plan Matrix which should be used as a foundation to evaluate risk:

17.1 INFECTIOUS CONTROL and ICRA SAFETY

STEP 1

Use the following Table to IDENTIFY the Type of Construction Project Activity (A-D)

TYPE A	***Inspection of Non-Invasive Activities.*** Includes but NOT Limited to: 1. Removal of Ceiling Tiles for Visual Inspection Limited to 1 Tile per 50 Feet 2. Painting (But NO Sanding) 3. Wall Covering, Electrical Trim Work, Minor Plumbing, and Activities which DO NOT Generate Dust or Require Cutting of Walls or Access to Ceilings other than for Visual inspection
TYPE B	***Small Scale, Short Duration Activities which Create Minimal Dust.*** Includes but NOT Limited to: 1. Installation of Telephone and Computer Cabling 2. Access to Chase Spaces 3. Cutting of Walls or Ceiling Where Dust Migration can be Controlled
TYPE C	***Work Which Generates Moderate to High-Level of Dust or Requires Demolition or Removal of any Fixed Building Components or Assemblies.*** Includes but NOT Limited to: 1. Sanding of Walls for Painting or Wall Covering 2. Removal of Floor Coverings, Ceiling Tiles, and Casework 3. New Wall Construction 4. Minor Duct Work or Electrical Work Above Ceilings 5. Major Cabling Activities 6. Any Activity, Which Cannot be Completed within a Single Work Shift
TYPE D	***Major Demolition and Construction Projects.*** Includes but NOT Limited to: 1. Activities which Require Consecutive Work Shifts 2. Requires Heavy Demolition or Removal of a Complete Cabling System 3. New Construction

STEP 2

Use the following Table to IDENTIFY the Patient Risk Group(s) which will be affected. When one or more of the Risk Group(s) will be affected, select the higher group:

LOW RISK	MEDIUM RISK	HIGH RISK	EXTEREME RISK
• Office Areas	• Cardiology • Echocardiography • Endoscopy • Nuclear Medicine • Physical Therapy • Radiology / MRI • Respiratory Therapy	• CCU • Emergency Room • Labor Delivery Room • Laboratories (Specimen) • Newborn Nursery • Outpatient Surgery • Pediatrics • Pharmacy • Post Anesthesia Care Unit • Surgical Units	• Any Areas Caring for Immune Compromised Patients • Burn Unit • Cardiac Lab • Central Sterile Supply • Intensive Care Unit • Medical Unit • Negative Pressure Isolation Rooms • Oncology • Operating Rooms including C-Section Rooms

STEP 3

Match the following - Patient Risk Group (Low, Medium, High, and Extreme) with the planned Construction Project Type of (A, B, C, and D) on the following Matrix to locate the Class of Pre-Cautions (I, II, III, or IV) or level of infection control activities required. Class I thru IV or Color-Coded Pre-Cautions are Delineated below

CONSTURCTION PROJECT TYPES				
Patient Risk Group	**TYPE A**	**TYPE B**	**TYPE C**	**TYPE D**
Low Risk Group	**I**	**II**	**II**	**III / IV**
Medium Risk Group	**I**	**II**	**III**	**IV**
High Risk Group	**I**	**II**	**III / IV**	**IV**
Extreme Risk Group	**II**	**III / IV**	**III / IV**	**IV**

NOTE: Infection Control Approval WILL BE REQUIRED when the Construction Activity and Risk Level Indicate Class III or Class IV Control Procedures are Necessary

ICRA DESCRIPTION of REQUIRED INFECTION CONTROL PRE-CAUTIONS by CLASS

	During Construction	Upon Completion
Class I	1. Execute Work by Methods to Minimize Raising Dust from Construction Operations 2. Immediately Replace a Ceiling Tile Displaced for Visual Inspection	1. Clean Work Areas Upon Completion of Task.
Class II	1. Provide Active Means to Prevent Airborne Dust from Dispersing into Atmosphere 2. Water Mist Work Surfaces to Control Dust while Cutting 3. Seal Unused Doors with Duct Tape 4. Block Off and Seal Air Vents 5. Place Dust Mat at Entrance & Exit of Work Areas 6. Remove or Isolate HVAC System in Areas where work is being Performed	1. Wipe Work Surfaces with Disinfectant 2. Contain Construction Waste before Transport in Tightly Covered Containers 3. Wet Mop and / or Vacuum with HEPA Filtered Vacuum before leaving Work Area 4. Remove Isolation of HVAC System in Areas where is being performed.
Class III	1. Remove or Isolate HVAC System in area where work is being done to prevent contamination of duct system 2. Complete ALL Critical Barriers (e.g., sheetrock, plywood, plastic), to seal area from non-work area or implement control cube method (cart with plastic covering and sealed connection to work site with HEPA Vacuum for vacuuming prior to exit) before construction begins. 3. Maintain negative Air Pressure within work site utilizing HEPA equipped air filtration units 4. Contain construction waster before transport in tightly covered containers 5. Cover transport receptacle or carts (tape covering unless solid lid	1. Do Not Remove Barriers from work areas until completed project is inspected by the Owner's Safety Department & Infection Control Dept & thoroughly cleaned by the Owner's Environmental Service Department 2. Remove Barrier Materials carefully to minimize the spreading of dirt & debris associated with construction 3. Vacuum Work Area with HEPA Filtered Vacuums 4. Wet Mop Areas with Disinfectant 5. Remove Isolation of HVAC System in Areas where work is being performed.
CLASS IV	1. Isolate HVAC System in area where work is being done to prevent contamination of duct system 2. Complete ALL Critical Barriers (e.g., sheetrock, plywood, plastic, to seal area from non-work area or implement control cube method (cart with plastic covering and sealed connection to work site with HEPA Vacuum for vacuuming prior to exit) before construction begins. 3. Maintain negative Air Pressure within work site utilizing HEPA equipped air filtration units. 4. Seal Holes, Pipes, Conduits, & Punctures. 5. Construct anteroom and require all personnel to pass through this room so they can be vacuumed using a HEPA vacuum cleaner before leaving work site or they can wear cloth or paper coveralls that are removed each time they leave work site. 6. All personnel entering work site are required to wear shoe covers. Shoe covers must be changed each time the worker exits the work area. 7. Do not remove barriers from work area until completed project is inspected by the owner's Safety Department and Infection Control Department and thoroughly cleaned by the owner's Environmental Services Dept.	1. Remove barrier material carefully to minimize spreading of dirt and debris associated with construction. 2. Contain construction waste before transport in tightly covered containers. 3. Cover transport receptacles or carts. Tape covering unless solid lid 4. Vacuum work area with HEPA filtered vacuums. 5. Wet mop area with disinfectant. 6. Remove isolation of HVAC system in areas where work is being performed.

STEP 4

- Identify areas surrounding the Project Area and Assess Potential Impact

Unit Below	Unit Above	Lateral	Lateral	Behind	Front
☐	☐	☐	☐	☐	☐
Risk Group	**Risk Group**	**Risk Group**	**Risk Group**	**Risk Group**	**Risk Group**

STEP 5

- Identify Specific Site of Activity (e.g., patient & medication rooms, etc.).
- Identify Related Issues for:
    - Ventilation (outages, air-flow direction, clean-to-dirty, etc.).
    - Plumbing (outages, hand-washing access, work area, flushing, etc.).
    - Electrical (outages for critical equipment in special ventilation rooms, monitoring, etc.).

STEP 6

IDENTIFY all issues related to Ventilation, plumbing, electrical in Terms of Occurrence of Potential Outages.

STEP 7

- Identify Containment Measures, utilizing the previous assessment tools.
    - What Types of Barriers? (e.g., solid-wall barriers are there?)

NOTE: Renovation or Construction areas shall be isolated from occupied areas during the scope of work and provide clean-to-dirty airflow with respect to surrounding areas.

STEP 8

Consideration for the following – Work hours, can or will work occur during Non-Patient Care Hours? Contact Nursing Supervisor prior to project personnel arriving; purpose is to determine the MOST Sensitive Patients & Coordinate through the duration of the project.

Do the plans allow for adequate number of isolation or negative air-flow rooms?
Do the plans allow for the required number and type of hand-washing sinks?
Does the Infection Control Staff agree with minimum number of sinks & utility rooms?
Discuss Containment issues with project team (e.g., traffic flow, housekeeping, etc.)
Is there potential risk of water damage (e.g., structural integrity, wall, roof, ceiling)?

INFECTION CONTROL CONSTRUCTION PERMIT			*Permit No:*
Location of Construction:			*Project Start Date:*
Project Coordinator:			*Estimated Duration:*
Who is Performing Work?			*Expiration Date:*
Supervisor:			*Telephone:*
CONSTRUCTION ACTIVITY		***INFECTION CONTROL RISK GROUP***	
☐	**Type A** – Inspection, Non-Invasive Activity	☐	**Group 1:** Low Risk
☐	**Type B** – Small Scale, Short Duration, Moderate to High Levels	☐	**Group 2:** Medium Risk
☐	**Type C** – Activity Mod to High Levels of Dust, Req 1 or more work shift to complete	☐	**Group 3:** Medium / High Risk
☐	**Type D** – Major Duration & Construction Activities Requires Consecutive Work Shifts	☐	**Group 4:** Highest Risk

	DURING CONSTRUCTION PROJECT	***UPON COMPLETION of PROJECT***
Class I	Execute Work by Methods to Minimize Raising Dust from Construction Operations Immediately Replace Ceiling Tiles Displaced	
Class II	Provide Active Means to Prevent Airborne Dust from Dispersing into Atmosphere Water Mist Work Surfaces to Control Dust While Cutting Seal Unused doors with duct tape Block off and seal air vents / exhaust Place dust mat at entrance & exit of work area Remove or isolate HVAC System in areas where work is being performed	Wipe Work Surfaces with Disinfectant Contain Construction Waste before transport in tightly covered containers Wet Mop and/or vacuum with HEPA Filter vacuum before leaving work area Remove isolation of HVAC system in areas where work is being performed
Class III	Remove or isolate HVAC system in area where work is being done to prevent contamination of duct system Complete all critical barriers (e.g., sheetrock, plywood, plastic, to seal area from non-work area or implement control cube method (cart with plastic covering and sealed connection to work site with HEPA vacuum for vacuuming prior to exit) before construction begins. Maintain negative air pressure within work site utilizing HEPA equipped air filtration unit Contain construction waste before transport in tightly covered containers Cover transport receptacles or carts, tape covering unless solid lid	Do Not Remove barriers from work area until completed project is inspected by the Owner's Safety and Infection Control Department and thoroughly cleaned by the Owner's Environmental Services Department Remove barrier materials carefully to minimize spreading of dirt and debris associated with construction Vacuum work areas with HEPA filtered vacuums Wet mop area with disinfectant Remove isolation of HVAC system in areas where work is being performed
Class IV	Isolate HVAC exhaust system in the area where work is being performed to prevent contamination of duct system Complete all critical barriers (e.g., sheetrock, plywood, plastic, to seal area from non-work area or implement control cube method (cart with plastic covering and sealed connection to work site with HEPA vacuum for vacuuming prior to exit) before construction begins Critical Barriers shall be erected from slab to slab A pre-barrier shall be erected from floor to ceiling with poly to build the permanent critical barrier Maintain negative air pressure within work site utilizing HEPA equipped air filtration units Seal holes, pipes, conduits, and punctures appropriately Construct anteroom and require all personnel to pass through this room so they can be vacuumed using a HEPA vacuum cleaner before leaving the work site or they can wear cloth or paper coveralls each time they leave the work site All personnel entering worksite are required to wear shoe covers & change each time the worker exits the work area During dusty & dirty operations, e.g., demo, workers may be required to wear Tyvek Suits Contain dusty or smokey operation with local exhaust such as smoke eaters / control measures such as misting material.	Do Not Remove barriers from work area until completed project is inspected by the Owner's Safety and Infection Control Department and thoroughly cleaned by the Owner's Environmental Services Department Remove barrier materials carefully to minimize spreading of dirt and debris associated with construction Contain construction waste before transport in tightly covered containers Cover transport receptacles or carts, tape covering unless solid lid Vacuum work areas with HEPA filtered vacuums Wet mop area with disinfectant Remove isolation of HVAC system in areas where work is being performed

18.0 LIFE SCIENES

SUPERVISOR and MANAGEMENT RESPONSIBILITIES:

- Pre-Planning Meeting is MANDATORY.
- BCCI Superintendent will be responsible for contacting the Administrator or Laboratory Manager each day or night before the commencement of work to inform them of the following activities:
    - Nature of Work.
    - Areas where work will be conducted, and special protection required.
    - Review clean-up procedures.
- BCCI Project Team and Superintendent, to include Laboratory Manager will contact the Facility Safety Division to conduct a walkthrough and identify potential hazardous materials, request for any environmental clearance, and identify areas which will be prohibited for entrance by employee staff during the work.
- Only the Facility Safety Division can and MUST issue Environmental Clearances.
- BCCI Superintendent, Facility Safety Division, and Laboratory Manager will be responsible for the identification of the following items prior to commencement of work:
    - Areas where tools will be stored until the end of the project.
    - Location of an area to store an emergency spill cart.
    - Identify protection procedures for equipment.

SAFETY PROCEDURES FOR WORK WITHIN A LABORATORY:

- Inform all employees of the hazards associated with the work in the areas and advise them of the restricted areas.
- All areas within the confines of a laboratory are to be considered contaminated; therefore, the following procedures will ALWAYS be followed:
    - Use a designated cart of tools only for this prescribed job.
    - Store in a designated sport within the laboratory until the end of the project.
    - Personal Protective Equipment (PPE) requirements will be determined on a case-by-case basis.

- Once PPE has been determined all workers must be provided with the required PPE and wear within the confines of the Laboratory.

- PPE will be Donned prior to entry into the laboratory.
    - If you need to leave the Laboratory during work.

    - Tyvek Suit can be taken off and hung in the room.

    - Gloves and Mask should be discarded in designated area.

- Upon re-entry the laboratory, PPE shall be put on prior to entering the actual laboratory.

- All PPE must be changed out when moving between rooms.

- Suits and gloves cannot be worn in hallways or into other areas without being changed out.

- At the end of the assigned shift, all tools must be wiped down with an alcohol or 10% bleach solution and returned to the designated storage area.

- While working in the laboratory, the buddy system will be utilized in the event of an accidental spill or other emergency (Refer to Emergency Spill Procedures of this document).

- Apply protective plastic to any countertop prior to placing tools on them.

EMERGENCY SPILL PROCEDURES

There are three (3) types of hazards associated with performing laboratory work and they are Biological, Chemical, and Radioactive. The below procedures should be taken in the event of an emergency spill:

- Biological = In the event of a spill involving a Biological hazard:

    - If the potential hazardous material did not contaminate your PPE; then the buddy will wait outside the door while the other buddy reports the incident via the Facility Emergency Number immediately.

    - The Hospital or Facility personnel will be responsible for the clean-up and clearance of the area.

    - If the hazardous material has in fact contaminated your clothing, then the contaminated clothing must be removed with gloved hands.

    - The Hospital or Facility personnel will assess the situation and determine further decontamination procedures, if necessary.

- Chemical = In the event of a spill involving a Chemical:

- If the potential hazardous material did not contaminate your PPE; then the buddy will wait outside the door while the other buddy reports the incident via the Facility Emergency Number immediately.

- The Hospital or Facility personnel will be responsible for the clean-up and clearance of the area.

- If the material contaminated your clothing; remove equipment and immediately flush the area with copious amounts of water for a minimum of fifteen (15) minutes. Report the incident to your Supervisor immediately.

- In the incident has caused an injury, the Facility or BCCI Superintendent shall retrieve the Safety Data Sheet (SDS) and escort the employee to the Emergency Room.

- Radiation = In the event there is interaction or spill of Radioactive Material:

    - If the potential hazardous material did not contaminate your PPE; then the buddy will wait outside the door while the other buddy reports the incident via the Facility Emergency Number immediately.

    - If PPE or boots have been contaminated or splashed, remove the affected items using gloved hands and immediately wash any splashed skin with soap and water.

    - DO NOT LEAVE THE AREA

    - The buddy not involved in the splash will report the incident via the Facility Emergency Number immediately.

GENERAL RULES:

DO NOT take personal items into the Laboratory Area; (e.g., radio, iPod, MP3 Player, etc.)

DO NOT use any telephone within the Laboratory or Sit at Anyone’s Desk

DO NOT bring food into or Eat in the Laboratory

DO NOT enter any room without authorization to work

DO NOT touch items or materials on the Laboratory Counter

18.1 ICRA SAFETY in LABORATORIES and STERILE ENVIRONMENTS

WORKING WITHIN STERILE ENVIRONMENTS

The below information includes work adjacent to Sterile Areas, which also included the floor above and below, and when there are penetrations through the area.

GOALS

- Eliminate the exposure to infection created by Construction Dust, Dirt, Debris, and Workers entering the existing Sterile Environments.
- Reduce Construction impact on Sterile Environments.

OBJECTIVES

- Adhere to the Facility Infection Control Procedures by isolating demolition and construction from the active Sterile Environment (including ventilation – negative pressure). This is accomplished by strictly adhering to the ICRA Guidelines.
- Maintain dust free passage of construction personnel, material, and equipment through the active Sterile Environment.
- Minimize the impact of a Construction Zone inside the Active Sterile Environment including the effects of noise, vibrations, and odors.
- Strictly comply with the standards of acceptable behavior in the hospital environment and enforcement thereof (*ZERO TOLERANCE POLICY*).

REQUIREMENTS

- Train ALL workers on the Facility Infection Control Policies & Procedures. The following training points will be explained and emphasized:
    - Germs carried in or one our persons are far more dangerous to individuals who are involved in surgery (also immunocompromised patients) than anything we can encounter ourselves.
    - Surgical Suites are STERILE ENVIRONMENTS, and we are NOT.

NOTE: PRE-CAUTION: CDC Bloodborne Pathogen guidelines for Body Substance Isolation (BSI) protection will be in effect for any workers involved in demolition or connection of new systems to existing systems, which could cause exposure to any body fluids. When working on a facilities existing system (e.g., sanitary piping, waste lines, or medical vacuum lines) personnel shall assume all fluids confined to these lines are contaminated and must wear PPE appropriate to the ICRA Policies and Procedures of the Facility.

- All equipment, materials, and personnel, to include tools and carts, will be treated as infected entering a Sterile Environment.

- All equipment and materials must be dust-free and covered prior to entering restricted sterile areas.

- All personnel will gown according to Facility Policies.

- Prior to entering or removing carts from a Sterile Environment, they will be wiped down or vacuumed off with a HEPA vacuum clearer including wheels as this prevents the introduction of airborne contaminants into the Sterile Environment.

- Strict adherence by all personnel to the Facility Infection Control Procedures for gowning up prior to entering Sterile Areas (e.g., bunny suit, scrubs, shoe covers, booties, hair covers, & surgical mask).

- Personnel must re-gown, to include clean booties, when existing the construction area and entering a Sterile Environment.

- At completion of work within the Sterile Environment, all materials and equipment must be cleaned and removed from the area clean. Adhere to the cleaning process, then notify BCCI Superintendent and Facility of completion of work to complete a terminal cleaning of the space.

19.0 CRANE SAFETY OPERATIONS

BCCI Construction, LLC is committed to protecting our personnel, trades, clients, architects, and public from any unsafe conditions or practices. The purpose of the Crane Safety Operations Process is to define the work practices and inspection procedures to ensure crane operations and hoisting are protected from potential hazards associated with the movement of equipment and materials. We expect to minimize risk to our personnel, property, and resources; BCCI restricts the crane operations to those professionals who are properly trained, authorized, or certified to exercise the craning and hoisting of equipment and materials.

The movement of large heavy loads, roof top units, and other equipment is crucial to the success and completion of any BCCI Project. Procedures and processes have been developed for such operations, to include extensive reviews and approval of any pick plan. As with any project there are significant safety issues or concerns, which MUST be considered for both for the operator(s) and project personnel, to include innocent bystanders within the vicinity. In order to successfully perform a crane operation on the project, the intent of this information is control and apply engineering and administrative controls of hazard by ensuring; equipment is maintained and operated according to the manufacturer's recommendations, operators and support personnel are trained and current, all safe work practices and safety standards and regulations are followed, environmental factors are monitored, plans are reviewed, and ensure all clearances with Federal Aviation Administration (FAA) have been files and checked.

NOTE: BCCI Construction, LLC requires all trades to procure the crane company and provide BCCI with all the required documentation, certifications, and inspections. BCCI Construction, LLC will only procure a crane once Executive Approval of BCCI and STOBG.

The following Crane Operations process has been developed and implemented, which MUST be followed. All Crane Operations and Plans MUST be scheduled and submitted to the BCCI Director of Safety and Safety Coordinator a MINIMUM of three (3) weeks prior to scheduled crane operation date. The Project Superintendent will then schedule a meeting as far in advance as possible with the trade, crane company, BCCI Safety to visit the project and determine hazards while surveying the area for proper placement of the crane so the operation can proceed while mitigating or eliminating risk.

Once plan is received from the Project Superintendent the Safety Division will review the plan for the following items:

- Overhead view of the operation to include swing radius.
- Job Hazard Analysis (JHA), Job Safety Analysis (JSA), or Pre-Task Plan (PTP).
- State of California Annual Crane Inspections & Quadrennial Certifications.
- Certificate of Insurance for Trade and Crane Company.
- Rigger Certifications of Trade and Crane Company.
- Federal Aviation Administration (FAA) Notice to Airman (NOTAM) if applicable.
- Traffic and Pedestrian Control Plans (if operation is NOT on Private Property).

- All Required Permits (e.g., Municipality, SFMTA, etc.).
- Identification of any Hazards (e.g., power or telephone lines, trees, etc.).
- Weights of all items to be lifted or hoisted into place.

Once approval is announced the crane operation plan will disseminated to the Project Superintendent and placed on the safety schedule as Safety is present at all crane operations to ensure all Safety Standards, Regulations, and Plans are strictly followed.

On the day of the operation safety will validate and verify the crane operations plan on site to include the following:

- Confirm Weather (WX) Conditions (Rain, Lightning, Fog, Wind, etc.) prior to proceeding:
    - In addition to WX confirmation, a check for any WX Advisories or Adverse WX Conditions
    - If it is determined winds exceed 17 knots (20 mph), then the operation will NOT proceed.
- Ensure facility has been cleared of all personnel not related to the operation.
- Survey of roof for open holes and validate personnel have Fall Protection if necessary.
- What communication requirements will be followed during the operations (radios, etc.).
- If in the vicinity of operational airfield, a White & Orange Checkered Flag atop of boom.
- Pictures of Operators & Riggers Certification, Set-Up, and Documentation of Operation.
- Conduct Safety Meeting about the operation with all personnel onsite.

Once all planned items have been lifted or hoisted to the designated location(s) and breakdown of the crane begins, the Safety Division will draft and send an electronic mail (e-Mail) to Senior Leadership, Project Team, and Client informing them the Crane Operation has been completed.

20.0 HAND and POWER TOOL SAFETY

PURPOSE

The purpose of this plan is to protect BCCI Construction, LLC personnel from the hazards of hand and power tools and to comply with CCR, *Title 8, Subchapter 7, General Safety Orders, Group 3*. This plan covers site-specific practices and requirements for safe hand portable tool operation and maintenance.

APPLICABILITY

Hand-held tools and portable equipment with point-of-operation hazards or physical defects (e.g., broken handles, mushroomed heads, dull edges), which may cause injury to the user. In addition to knives, axes, shovels, hammers, chisels, and paper cutters, and Portable Power Tools supplied by energy (e.g., pneumatic, hydraulic, powder-actuated, explosive actuated, and compressed air).

RESPONSIBILITIES

BCCI Construction, LLC will protect their personnel from hazards related to hand, portable power tools, and equipment through engineering controls, tool safeguards, communication of hazards and solutions, training, and Personal Protective Equipment (PPE).

DIRECTOR OF SAFETY & SAFETY COORDINATOR – RESPONSIBLE FOR:

- Identify hazardous conditions with respect to hand and / or power tools.
- Inspect areas to ensure this program is being adhered to.
- Provide safety awareness training.
- Maintain Training records, maintenance & inspection records.

SUPERINTENDENT – RESPONSIBLE FOR

- Anticipate Work Hazards
- Ensure personnel are trained in proper inspection, use, and maintenance of each tool
- Provide additional on-the-job (OJT) training if employee is not familiar with equipment
- Provide safe hand and portable power tool equipment to personnel
- Remove defective hand or portable power tools from service

NOTE: Superintendent may designate other employees to implement and enforce the provisions of this plan.

PERSONNEL –

- Anticipate Work Hazards.
- Understand and follow hand & power tool safety procedures in this plan.
- Follow safety guidelines for use of hand & power tool IAW manufacturer's instructions.
- Inspect hand & power tools prior to each use & use right tool for tasking.
- Refrain from using damaged hand or portable power tools.
- Immediately remove damaged tools from use & report to supervision.
- DO NOT tamper with or remove safety guards or alter configuration of any tool.

DEFINITIONS

Hand Tool – a tool which is non-powered or operates only through physical exertion by hand (e.g., axes, screwdrivers, wrenches, pliers, tinsnips, and paper-cutting boards).

Point of Operation – The area of the tool where the work is performed, which may expose the employee to injury if defective or not properly guarded.

Portable Power Tool – A portable tool which requires a power source to operate (e.g., electric, pneumatic, liquid fuel, hydraulic, explosive-actuated, and powder-actuated device, or power supply). Other examples of regulated portable power tools are portable abrasive wheels and grinders, lawn mowers, powered drills, portable circular saws, portable belt sanding machines, explosive-actuated fastening tools, jacks, and abrasive blast cleaning nozzles

HAZARD ASSESSMENTS

The Superintendent or designated representative will ensure a hazard assessment is conducted in each work area where hand & portable power tools may be used. The assessment will identify hazards which could employees to:

- Flying Objects, Electric Shock, Sparks
- Punctures, Lacerations, and Crushing Forces

For example, sparks produced by iron and steel hand tools can be a dangerous ignition source around flammable and combustible substances.

Once hazards are identified, the Superintendent will recommend appropriate control measures (elimination, substitution, engineering, or administrative) and provide guidance on appropriate PPE selections when a hazard control is not feasible or satisfactory.

Superintendents may use the attached Job Hazard Analysis Worksheet and PPE Hazard Assessment Certificate for guidance when conducting assessments.

GENERAL SAFETY REQUIREMENTS (PERSONAL PROTECTIVE EQUIPMENT – PPE)

Employees using hand and power tools may be exposed to falling, flying, abrasive and splashing objects, fly dusts, fumes or mists, vapors, or gases, and should be fitted with the appropriate Personal Protective Equipment (PPE) necessary to protect them from hazards.

NOTE: Safety eyewear, hard hats, gloves, high visibility clothing, and appropriate safety work boots are required on all BCCI Construction, LLC Projects.

HEARING PROTECTION

Hearing Protection is recommended when using power tools. [Refer to Hearing Conservation Written Program for more information about Noise Protection]

TOOL MAINTENANCE

All hand, portable power tools, and similar equipment, whether furnished by BCCI Construction, LLC, will be maintained regularly and kept in a safe working condition.

HOUSEKEEPING

Floors will be kept clean and dry as possible to prevent slips, trips, and falls. Extension Cords will be used as needed for Temporary Power ONLY and must be properly stored when not in use. All refuse and waste will be properly disposed of in the appropriate receptacles & waste containers, while all work areas and walkways will be well lit.

HAND TOOLS

Hand tools are non-powered type tools which operate only by physical exertion. The greatest hazards posed by hand tools result from misuse and improper maintenance.

- Hand Tool pre-cautions include the following:
- Use the right tool for the job.
- Saw blades, knives, or other sharp tools will be directed away from aisle areas and other employees working in proximity.
- Knives and scissors will be kept sharp, dull tools can be more hazardous than sharp ones.
- Only spark-resistant tools made from brass, plastic, aluminum, or wood will be used around flammable substances.
- Wrenches, including adjustable, pipe, box-end, and socket-style wrenches, will not be used when the jaws or socket are stripped or sprung in such a way which spillage occurs.
- Impact tools such as drill pins or punches, wedges, and chisels will be kept free of mushroom heads.

- Wooden-Handled tools will be kept free of crack and splinters and will be kept tightly attached to the working end of the tool.

- Tools will be stored in appropriate areas when not in use.

PORTABLE POWER TOOLS

A portable tool requires an electrical power source to operate, such as electric, pneumatic, liquid fuel, hydraulic, explosive-actuated, and powered actuated device or power supply. Power tools can be hazardous if used improperly.

- Examples of Regulated Power Tools include:

- Portable Abrasive Wheels & Grinders

- Powered Drills & Portable Circular Saws

- Portable Belt Sanding Machines

- Explosive -Actuated Fastening Tools

- Abrasive Blast Cleaning Nozzles

Power tool general pre-cautions include the following:

- Read Owner's Manual for tool applications, limitations, operation, & hazard.

- Use the right tool for the job.

- Inspect tools prior to each use, which includes power cord and plug.

- Wear proper eye and face protection while operating power tools.

- Never carry a tool by the power cord or hose.

- Never pull the cord or the hose to disconnect from a receptacle.

- Never stand in or near water when operating tools.

- Keep ALL cords and hoses away from heat, oil, or sharp edges.

- Electric power tools will be either a three-wire grounded or double insulated and must be listed by Underwriter Laboratory's (UL) or another recognized agency.

- Disconnect tools and ensure a zero-energy state when not in use, prior to servicing and cleaning, and when changing accessories such as blades, bits, and cutters.

- Ensure unauthorized personnel are kept away from the work area by using signage, barricades, stanchions, keyed access, etc.

- Avoid accidental starting; do not hold fingers on the switch button while carrying a plugged-in tool.

- Maintain tools with care; keep them sharp and clean for the best performance.

- Never leave tools unattended with parts still moving; even after the machine is turned off, some parts may still be capable of moving.

- Maintain good housekeeping practices by keeping the work area free of debris or other items which can get caught in tools or power equipment.

- Follow the manufacturer's manual for the tool when lubricating and changing accessories.

- Maintain good footing and balance when operating power tools.

- DO NOT wear loose clothing, ties, or jewelry when operating portable power tools; such items can become caught in moving parts.

- Remove all damaged or defective portable electric tools into Ground-Fault Circuit Interrupter (GFCI) protected receptacles or in compliance with facility's assured electrical grounding conductor program.

- Remove all damaged or defective portable electric tools from use and tag them: "DO NOT USE." If not repairable, cut off power cord and discard / recycle.

- Cup wheels (Type 6 and 11) will be protected by safety guards or special "revolving cup guards" which mount behind the wheel and turn it. They will made of steel or other material with adequate strength and will enclose the wheel sides upward from the back for one-third of the wheel thickness.

- The maximum angular exposure of the portable grinding wheel periphery and sides for safety guards on other portable ringing machines will not exceed 180º and the top half of the wheel will always be enclosed.

- Belt sanding machines will be provided with guards at each nip point where the sanding belt runs onto a pulley.

- NEVER Clamp a hand-held grinder in a vise.

GUARDS:

Hazardous moving parts of a power tool MUST be safeguarded (e.g., belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating), or any moving parts of equipment shall be guarded if such parts are contact exposure by personnel.

Guards, as necessary, shall be provided to protect the operator and others from the following:

- Point of Operations, Nip Points, Rotating Points

- Flying Chips, Sparks, Dust, and Debris

POWER TOOL GUARDING PRE-CAUTIONS INCLUDE

- Always consult supervisor when the manufacturer recommendations for guarding a specific power tool are not available or cannot be implemented.
- Guards must not be removed or bypassed unless the power tool is unplugged or locked out from the power source and is in a zero-energy state.
- Notify a supervisor immediately when any unguarded moving parts or dangerous points of operation are observed.
- Stop work and shut down the tool until the condition is corrected.
- Do not use unauthorized or damaged guards.
- Operate power tools only when all guards are in place and properly attached according to the manufacturer's recommendations and are functioning properly.
- If a guard is damaged, bypassed, or missing, the tool will be removed from service and tagged with "Do Not Use" until repairs can be made.

SAFETY SWITCHES

All hand-held power tools will be fitted with any one of the following safety switch methods as appropriate for the tool:

- A Momentary contact “On-Off” Control.
- A Lock-On Control provided the turn-off can be accomplished by a single motion of the same finger or fingers which turn it on.
- A pressure switch which requires constant pressure to run and will shut off when the pressure is released.

ELECTRIC TOOLS

Portable electric tools will use approved double-insulated type and used with an approved grounding device such as a GFI (Ground Fault Indicator) to prevent the unlikely event of an electric shock.

- Electric-Power Operated Tool precautions include the following:
- Never use electrical cords for hoisting or lowering of tools.
- Unplug the power cord by the pulling on the power plug versus pulling the cord.
- Keep cords and hoses away from heat, oil, and sharp edges.

- Operate electrical tools only within the designed limitations.
- Wear gloves and safety footwear during use of electric tools.
- When not in use, store electrical tools in a dry place.
- DO NOT use electrical tools in damp or wet locations without authorization & proper precautions take to prevent electrical shock.

PNEUMATIC TOOLS

- Pneumatic tools are powered by compressed air and include drills, hammers, and sanders
- Pneumatic Tool precautions include:
- Pneumatic power tools will be secured to the hose or whip by some positive means such as a tool retainer to prevent the tool from becoming accidentally disconnected.
- Safety clips or retainers will be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled.
- Eye protection is required, and face protection is recommended for employees working with pneumatic tools.
- Use appropriate hearing protection when working with noisy tools such as jackhammers.
- Screens must be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers, or air drills.
- The safe operating pressure stated by the manufacturer will not be exceeded.
- Pneumatic powered tools will be secured to the hose or connection by a positive means to prevent them from being accidentally expelled.
- Hoses will not be used for hoisting or lowering.
- All hoses exceeding ½ inch inside diameter must have a safety device to reduce pressure should the hose fail.
- All pneumatically driven nailers, staplers, and other similar tools provided with automatic fastener feeds which operate at more than 100 psi pressure to the tool will have a safety device on the muzzle end to prevent the tool from ejecting fasteners unless the muzzle is in contact with the work surface.
- A safety clip or retainer must be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel.

- Compressed air guns must never be pointed toward anyone. Users must never "dead-end" the gun against themselves or anyone else.

- Eye protection must be worn when operating a compressed air gun.

- Supplied compressed air will not be used for cleaning purposes except when reduced to 30 pounds per square inch (psi) and then only with effective chip guarding and with proper PPE.

- Airless spray guns which atomize paints and fluids and operate at pressure of 1,000 psi or more will be equipped with an automatic or visible manual safety device which prevents the accidental pulling of the trigger to prevent the release of paint or fluid until the device is manually released.

- Instead of the safety device, the gun may be equipped with a diffuser nut which will prevent high pressure and high velocity release while the nozzle tip is removed, plus a nozzle tip guard, or other equivalent protection, which will prevent the tip from encountering the operator.

- Abrasive blasting nozzles will be equipped with a valve which must be activated manually for operation and a holding rack for non-operation. The nozzle will be mounted on a support when it is not in use.

HYDRAULIC POWER TOOLS

The fluid used in hydraulic powered tools will be fire-resistant and must retain its operating characteristics at the most extreme temperatures to which it will be exposed. The manufacturer's safe operating pressures for hoses, valves, pipes, filters, and other fittings will not be exceeded.

JACKS:

- A jack is an appliance for lifting and lowering or moving horizontally a load by application of a pushing force. Jacks may be lever and ratchet, screw, and hydraulic.

- The manufacturer's rated capacity for the jack will be legibly marked on all jacks and will not be exceeded. All jacks will have a positive stop to prevent and stop over-travel.

- When providing a firm foundation, the jack base, as well as the cap, will be blocked or cribbed to prevent slippage.

- Where there is a possibility of slippage of the metal cap of the jack, a wood block shall be placed between the cap and the load.

- Jacks will be maintained according to the manufacturer's recommendations and inspected at least every 6 months and prior to use.

- For jacks subjected to abusive conditions such as freezing, load shock, or extreme heat, the jack will be examined for possible defects.

- Any jack found damaged or defective will be removed from service immediately and tagged with a "Do Not Use" tag. It is not being used until repaired by a person qualified to perform such repairs.

FUEL-POWERED TOOLS

1. All fuel-powered tools will be stopped during refueling, servicing, or maintenance.

- Fuel will be transported, handled, and stored in accordance with USEPA and USDOT rules and procedures.

- When fuel-powered tools are used in enclosed spaces, the applicable requirements for toxic gas monitoring and use of PPE will be applied.

POWDER-ACTUATED TOOLS

Powder-actuated tools are also known as "explosive-actuated." Such tools are actuated by explosives or any similar means, and propel a stud, pin, fastener, or other object for the purpose of affixing it by penetration into any other object. Only personnel who have been trained and certified in the safe operation of the powder-actuated tool use will be allowed to operate a powder-actuated tool.

Powder-Actuated Tool precautions include:

Inspect the tool prior to use.

- Any tool found not in proper working order, or which develops a defect during use, will be immediately removed from service, tagged "Do Not Use", and not used until properly repaired by an authorized provider.

- Tools will not be loaded until just prior to the intended firing time. At no time, loaded or unloaded, are the tools to be pointed at any employees.

- Hands will be kept clear of the open barrel.

- Loaded tools will not be left unattended or be accessible to unauthorized persons.

- Tools will not be used in an explosive or flammable environment.

- Fasteners will not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface-hardened steel, glass block, live rock, face brick, or hollow tile.

- Driving into materials easily penetrated will be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying-missile hazard on the other side.

- In case of a misfire, the operator will hold the tool in the operating position for at least 30 seconds and then try to operate the tool a second time. The operator will wait

another 30 seconds, holding the tool in the operating position, then proceed to remove the explosive load in strict accordance with the manufacturer's instructions.

- Fasteners will not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface-hardened steel, glass block, live rock, face brick, or hollow tile.

- Driving into materials easily penetrated will be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying-missile hazard on the other side.

- Fasteners will not be driven directly into materials such as brick or concrete closer than 3 inches from the unsupported edge or corner or into steel surfaces closer than ½ inches from the unsupported edge or corner, unless a special guard, fixture, or jig is used. (Exception: Low-velocity tools may drive no closer than 2 inches from an edge in concrete or ¼ inches in steel).

- When fastening other materials, such as a 2- by 4-inches wood section to a concrete surface, it is permissible to drive a fastener of no greater than 7/32-inch shank diameter not closer than 2 inches from the unsupported edge or corner of the work surface.

- Fasteners will not be driven through existing holes unless a positive guide is used to secure accurate alignment.

- No fastener will be driven into a spalled area caused by an unsatisfactory fastening.

- Driving into materials easily penetrated will be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.

21.0 FLAMMABLE AND COMBUSTIBLE MATERIALS - LIQUIDS

- Segregate non-compatible materials, which may create a fire hazard, with a fire barrier rated for at least one hour or separated by 20 feet.
- Use approved metal safety cans for flammable liquids or materials.
- Flammable or combustible liquids or materials shall not be stored in areas used for egress.
- Storage or handling of flammable liquids or gases is prohibited in any location, that could jeopardize egress from the site.
- Use only approved metal storage cabinets for flammable or combustible liquids or materials and label “Flammable - Keep Fire Away”.
- Vent flammable/combustible storage cabinets to the outdoors.
- A portable fire extinguisher with a minimum of 20 - ABC rating must be located within ten (10) feet of storage area.
- Do not refuel equipment indoors with liquids with flash points below 100 degrees (gasoline, propane).
- Storage of LPG (Liquefied Petroleum Gas) is not permitted within buildings.
- Use flammable liquids only where there are no open flames or other source of ignition within 50 feet of the operation.
- Dispensing of flammable liquids requires bonded and grounded containers.
- Label all containers.
- All flammables/combustibles shall be stored in metal containers.
- SDS sheets shall arrive with hazardous materials.
- Disposal of hazardous materials will comply with Federal, State, and Local Regulatory requirements.
- Remove flammable and combustible items including dirty rags from the job each day or stored in closed metal containers.
- At the end of each workday, it will be the responsibility of each subcontractor to make sure all work areas are clean. Remove all trash and debris to dumpsters.
- Bulk storage location of flammable and combustible gases and liquids is exclusively at the discretion of Structure Tone and/or the Owner.
- Bulk storage containers shall be stored with a catch basin for spill control.

- The storage and use of flammables and combustibles shall follow NFPA 30.

- No more than 5 gallons of flammable or combustible liquids shall be stored in a room outside of an approved storage cabinet. Storage locations must be approved before bringing onto site.

- “No Smoking/Vaping or Open Flame” signs required to be posted within Flammable storage areas.

- Trades storing, using flammable, & combustible liquids on the project site shall review and comply with NFPA, Local Municipal Fire Department Standards & OSHA regulations 1926.153 (a) and (g).

- Trades with bulk or large-scale storage needs shall consult in advance with BCCI Construction for assignment of safe storage space and instructions for safe storage.

- BCCI Construction, LLC shall strictly enforce subcontractors’ compliance with the following requirements:

- Use only approved U.L. safety cans for handling and storing flammable liquids. Once a drum of flammable liquid is opened, it must be provided with an U.L. grounding and bonding system(s), dispensing system(s), and vent bung.

- Provide adequate ventilation in areas where flammable and combustible liquids are stored or in use. Trades shall comply with Local Municipal Fire Safety Codes and OSHA regulations 1926.55, (a) and (c) and 1926.57 (a) through (3).

- Use U.L. approved fire extinguisher in areas where flammable and combustible liquids are stored or in use.

- Keep all areas where flammable and combustible liquids are stored and used clear of debris and sources of ignition.

22.0 ELECTRICAL SAFETY AND METHOD OF OPERATING PROCEDURE (MOPs)

Working with electricity can be dangerous. Engineers, electricians, and other professionals who work with electricity directly, and others, who work with electricity indirectly may also be exposed to electrical hazards. Electricity has long been recognized as a serious workplace hazard. OSHA's electrical standards are designed to protect employees exposed to dangers such as electric shock, electrocution, fires, and explosions. Contact with electricity is the second leading cause of fatalities within our industry. BCCI Construction, LLC has developed and implemented the following procedures to protect our personnel and reduce the risk of an incident or accident.

- Only trained, qualified, and authorized personnel can make electrical reports or work on electrical equipment and installations.
- All electrical systems and equipment will be treated as “LIVE” until the system or equipment has been validated and verified it is de-energize.
- All energized equipment or installations will be de-energized prior to the start of any maintenance or repairs.
- If for any reason (Testing) of the electrical equipment or installation MUST be energized, pre-task planning and coordination WILL occur first, while special pre-cautions WILL be taken to ensure the safety and protection of personnel against electrical shock.
- All equipment will have Lockout/Tagout (LOTO) applied to protect against accidental or inadvertent operation of the equipment or panel (e.g., switch, breaker, circuit, etc.)
- NEVER attempt to operate a switch, breaker, circuit, valve, etc., with an isolating lock
- Safety grounds WILL always be used where there is potential for shock from back-feeding or from another form of hazard.
- NFPA 70E Protection Suit or regular electrical PPE will always be worn (to include proper eye protection) when working with electrical equipment.
- Always use sound Risk Management when working or energizing electrical equipment.
- All power tools (battery or hard wired) will be grounded or double insulated.
- All tools will be inspected prior to use, defective tools (e.g., cords, wiring or other operating parts) will be removed from service.
- GFCI of 12 gauge or less will be utilized and conform to NFPA 70E.
- Ensure barricades are established when working with electrical installation or equipment.
- Electrical Room doors are to remain locked and closed to prevent unauthorized access.

NOTE: BCCI Construction, LLC DOES NOT Allow Any form work to be performed on Energized HOT Circuits or Equipment. NO EXCEPTIONS

MEHTOD OF OPERATING PROCEDURE (MOP) PROCESS

All MOP forms must be coordinated a minimum of ***two (2) weeks prior*** to the scheduled MOP work. This coordination MUST involve the following individuals, Electrical Trade, Project Superintendent, Project Manager, and Director of Safety.

The following information MUST accompany the BCCI MOP Form (Long or Short):

- Electrical Trade MOP
- Panel Schedule, Line Diagram, and Photos (REQUIRED)
- Electrical Trade First Aid, CPR, AED Certification of Crew
- Electrical Trade MUST have the Director of Safety, Safety Manager Review & Sign

NOTE: AT NO Time may the BCCI MOP Forms be given to Trade to complete on our behalf. BCCI Construction, LLC will and does NOT approve a Trades documented process. There are NO Exceptions to this process.

Once the above documentation is received from the Electrical Trade, the BCCI Superintendent will complete the appropriate BCCI MOP Form (Long or Short) and the entire package to the BCCI Director of Safety and Safety Coordinator for review and final approval.

Upon completion of review and approval, the Safety Division will send back to the Superintendent for a final review and approval from the Building Engineer, Client, or Client Representative.

Once the MOP work is completed, the BCCI Superintendent and Electrical Trade will sign the MOP form. Then the Superintendent will forward the entire signed package to the Safety Division for closure within 24 hours of completion.

DAY of SCHEDULED MOP

Prior to the start of the MOP, a Safety Meeting will be held between the Electrical Trade and BCCI to inspect PPE, Set-Up Barricades, Evacuation Routes, Stage Tools, and discuss the MOP to ensure all personnel understand the process and steps. Once this is completed the MOP work WILL commence.

MOP WORK REQUIRING BCCI – LONG FORM

Panel Shut Down	IDF or MDF Room Performed Work
Switch Gear	Transformer Work
Thermal Scanning	Bus Riser, Bus Riser Taps, or Re-Feeds

MOP WORK REQUIRING BCCI – SHORT FORM

Dedicated Breakers or Circuits (LOTO REQUIRED)	Temporary Power Tie-In & Removal (e.g., Concrete Polishing, Welders, or any device requiring connection to main panel.

ELECTRICAL SAFE-OFF AND DEMOLITION PROCESS

BCCI Construction, LLC has set forth in our electrical safe-off and demolition process to have as many “Eyes” as possible observing and implementing the protection of our personnel, while establishing surveillance to ensure the safety of personnel while reducing or mitigating the interruption of the systems both critical and normal of the building.

FOUR “CHECK” SYSTEM

- Superintendent has the responsibility to schedule the safe-off process with the Chief Building Engineer and Electrical Trade.
- Superintendent is to clearly identify and communicate the scope for demolition and safe-off to all trades on the project and relay the timeline of activities to all personnel to include BCCI personnel.
- The demolition Sub-Contractor is responsible to arrange for the foreman to be present during the demolition to include walking the project with the Superintendent prior to the start of the project.

NOTE: If the demolition foreman who attended the walk of the project is NOT onsite during the demolition process, the project will be stopped until their arrival.

- The Electrical trade is responsible to safe-off all energized circuits to include the life safety circuits within the walls to be demolished. There will be NO demolishing of walls containing any energized circuit, switch, strobe, or outlet.
    - The Electrical trade MUST validate and verify all devices are “Dead” via the use of a voltage meter.
    - During safe-off and demolition of ceiling tiles may require the emergency circuits to remain “Live” during this process.
    - All “Hot” remaining will be clearly identified with “Red Danger Tape” every six (6) feet and all junction boxes with energized circuits will be covered.
    - All items which are safe-off MUST be physically “Divorced at Each End” by the Electrical trade prior to start of the demolition process and verified by Superintendent.
    - Upon completion of safe-off all “Live” circuits which must remain will be communicated to the project Superintendent prior to the start of demolition.
- BCCI Laborers involved in after hours supervision (when applicable), MUST use a circuit tester to confirm all devices are “Dead” prior to demolition.
- All Demolition contractors are to assume all devices and conduits are “Hot” prior to starting the demolition process.
- Demolition contractors are responsible for the utilization of circuit testers to verify all circuits, outlets, and conduit are de-energized prior to the demolition process.

- DEMOLITION WILL NOT take place containing an energized, circuit, outlet, or conduit which are energized.

- Demolition contractor(s) are responsible for the layout of demolition and the Project Superintendent is to walk with the demolition foreman and crew to confirm layout is accurate, and true and correct.

WORKING WITH ENERGIZED CIRCUITS

- Any work to be performed on an electrical system(s) WILL Never be accomplished while the circuit are energized.

- Electrical trade(s) are required to adhere to their and the facilities published Lockout / Tagout (LOTO) processes and procedures.

- All access to any energized electrical system (junction boxes) must be completed by an experienced electrician ONLY (e.g., Foreman, General Foreman, Superintendent, etc.).

- The experienced electrician shall make an informed decision to disturb the wires only if the junction box is NOT overly full of wires, and if the experienced electrician can visually verify all the connections are safely attached.

- If the experienced electrician is NOT confident the wires are NOT safely connected or moved or adjusted without incident, then the circuit or junction box must be de-energized prior to proceeding with any form of work.

TRADE	NAME (Printed)	Date
BCCI Superintendent	Name (Printed)	Date

NOTE: This is to be completed at mobilization with the Electrical & Demolition Crew. Once signed this document is to be upload to the project in ProCore and sent via e-Mail to the BCCI Director of Safety.

MISSION CRITICAL WORK – METHOD OF OPERATING PROCEDURE (LONG FORM)

METHOD OF OPERATIONS PROCEDURE (LONG FORM)			
Project Name:			
Project Address:			
Project Number:			
MOP Issue Date:			
Name & Title		**Telephone**	
Company	BCCI Construction, LLC	**FA, CPR, AED**	☐ YES ☐ NO ☐ N/A
Client Rep		**Telephone**	
Title		**e-Mail**	

Start Date		**Start Time:**
End Date		**End Time:**

MOP SCOPE OF WORK

BCCI SUPERVISION ONSITE

Company	Contact	Title	Cell	First-Aid/CPR Certified?
				☐ YES ☐ NO ☐ N/A
				☐ YES ☐ NO ☐ N/A

TRADE PERSONNEL ONSITE

Company	Contact	Title	Cell	First-Aid/CPR Certified?
				☐ YES ☐ NO ☐ N/A
				☐ YES ☐ NO ☐ N/A

CLIENT SUPPORT STAFF

Company	Contact	Title	Cell	e-Mail

PERSONNEL ON STANDBY

Company	Contact	Title	Cell	CPR-FA Certified?
				☐ YES ☐ NO ☐ N/A
				☐ YES ☐ NO ☐ N/A

SYSTEMS IMPACTED BY SCOPE OF WORK

System	System Affected	Safe Off Required	Shut Down Required	Responsible Party	Restart Responsibility	Stand-By / Backup	Client Support
HVAC	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Electrical	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Emergency Lighting	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Server/ Network/IT	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Sprinkler	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Life Safety	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Security	Y☐ N☐	Y☐ N☐	Y☐ N☐				
UPS	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Vertical Systems	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Pre-Action	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Emergency Generator	Y☐ N☐	Y☐ N☐	Y☐ N☐				
Temp Cooling	Y☐ N☐	Y☐ N☐	Y☐ N☐				

RISKS & MITIGATE IDENTIFIED RISKS

- Arc Flash / Blast – Required NFPA 70E Protective Suit – Category
- Electrocution / Shock – Normal Day-to-Day PPE, Follow Processes, Procedures, & Guidelines
- Lost Tools – Ensure Tool Accountability Check Performed prior to Re-Energizing Riser / Panel
- Component Failure – Ensure (N) Components are Readily Available if Component Fails
- Evacuation Routes – Means of Egress Shall be Clear of Material & Debris, know meeting spot
- Fire – Appropriate & Serviceable Fire Extinguisher are onsite & outside of all work areas
- Blackout – Battery Operated lights are operable & readily available in work areas affected

ADDITIONAL DOCUMENTATION REQUIREMENTS

Are there attachments to this MOP? **(Attach Sub-Contractor MOP Procedure, Panel Schedule, Line-Diagram, Photos, etc.)**	☐ YES ☐ NO ☐ N/A	

NEAREST URGENT CARE & MEDICAL FACILITY

Concentra			

DETAILED STEPS (MUST BE COMPLETED SEQUENTIALLY)

Step No.	***Responsible Party***	***Description of Activities (PRE-SHUTDOWN / TASK)***	***Date***
1	**BCCI**	Coordinate MOP with Construction Manager, Client, and Bldg Engineer	**ASAP**
2		Safety Meeting, Evacuation Routes, Inspection of PPE, Hazards of Task, Safe Work Practices, Set-Up Barricades, Stage Tools and Equipment	
Step No.	***Responsible Party***	***Description of Activities (DAY OF SHUTDOWN / TASK)***	***Date***
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
Step No.	***Responsible Party***	***Description of Activities (AFTER SHUTDOWN / TASK)***	***Date***
1			
2			

INCIDENT RESPONSE

If a service interruption or incident occurs, the following steps WILL be followed:

- Cease ALL operations immediately & Notify Local Emergency Medical Services (911).
- Ensure ALL Equipment is safe-off and set-up an additional barricade.
- Notify Chief Building Engineer & Client Representative with the information below.
- A Mishap Form & Report MUST be completed & given to Director of Safety & Client

	Name/Center/Department/Support	Phone
1	***Security / Building***	
2	***Local Emergency Services (Fire, Medical, Police)***	***911***
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		

UPON COMPLETION OF SCOPE OF WORK SIGNATURES ARE REQUIRED BELOW:

Electrician Signature:	**Date:**
BCCI Signature:	**Date:**

NOTE: The entire MOP Package will be signed and forwarded to the BCCI Director of Safety within 24 hours of completion for closure of OPEN MOP.

METHOD OF OPERATING PROCEDURE (SHORT FORM) DEDICATED CIRCUITS

METHOD OF OPERATIONS PROCEDURE CHECKLIST FORM			
DEDICATED BREAKERS			
Project Name:			
Project Address:			
Project Number:			
Start-End Date & Time:			
Description of Work:			
Sub-Contractor Performing Work:			
Does the Shut-Off of Breakers and LOTO affect any other systems? **NOTE: If YES, *Utilize BCCI MOP Long Form*; If NO, Continue with *Short Form***	☐ YES ☐ NO		
QUESTIONS	**YES**	**NO**	**N/A**
Is Personal Protective Equipment (PPE) On-Hand, Inspected, and Serviceable?	☐	☐	☐
Are Personnel Qualified to Work on Electrical Equipment?	☐	☐	☐
Are all Tools and Personal Protective Equipment (PPE) Double Insulated?	☐	☐	☐
Are Qualified Electrical Workers First-Aid / CPR Trained and Current?	☐	☐	☐
Does Qualified Electrician Have all Lock-Out/ Tag-Out (LOTO) Locks & Tags?	☐	☐	☐
Are Electrical Equipment/Systems De-Energized & Appropriate LOTO Applied?	☐	☐	☐
Have all Affected Workers Been Notified of the Scheduled Electrical Work?	☐	☐	☐
Are All Tools and Equipment Accounted for Prior to Energizing Temp Cords?	☐	☐	☐

BCCI PERSONNEL			
Name	***Title***	***Contact***	***First Aid – CPR - AED***
			☐ YES ☐ NO ☐ N/A
			☐ YES ☐ NO ☐ N/A

SUB-CONTRACTOR PERSONNEL				
Company	***Name***	***Title***	***Contact***	***First Aid – CPR - AED***
				☐ YES ☐ NO ☐ N/A
				☐ YES ☐ NO ☐ N/A

Electrician Signature: (REQUIRED)		**Date:**	
BCCI Superintendent: (REQUIRED)		**Date:**	

Nearest Concentra Urgent Care & Medical Center			
Concentra			

NOTE: The entire MOP Package will be signed and forwarded to the BCCI Director of Safety within 24 hours of completion for closure of OPEN MOP.

METHOD OF OPERATING PROCEDURE (SHORT FORM) TEMP POWER TIE-IN/REMVOAL

METHOD OF OPERATIONS PROCEDURE CHECKLIST FORM				
TEMP POWER TIE-IN / REMOVAL				
Project Name:				
Project Address:				
Project Number:				
Start-End Date & Time:				
Description of Work:				
Sub-Contractor Performing Work:				
Does this Temp Power and LOTO affect any other systems? ☐ **YES** ☐ **NO**				
NOTE: If **YES** then Utilize the BCCI MOP Long Form; If **NO**, then Continue with this Short Form.				
QUESTIONS			**YES**	**NO** / **N/A**
Is Personal Protective Equipment (PPE) On-Hand, Inspected, and Serviceable?			☐	☐ / ☐
Are Personnel Qualified to Work on Electrical Equipment?			☐	☐ / ☐
Are all Tools and Personal Protective Equipment (PPE) Double Insulated?			☐	☐ / ☐
Does the Qualified Electrician have the LOTO Locks and Tags?			☐	☐ / ☐
Will Lock-Out / Tag-Out be Required Under this Scope of Work?			☐	☐ / ☐
Are Electrical Equipment/Systems De-Energized & Appropriate LOTO Applied?			☐	☐ / ☐
Are Temporary Power Cords Serviceable and Inspected Prior to Use?			☐	☐ / ☐
Are Spider Boxes Serviceable and Inspected Prior to Placing in Service?			☐	☐ / ☐
Are All Tools and Equipment Accounted for Prior to Energizing Temp Cords?			☐	☐ / ☐
BCCI PERSONNEL				
Name	***Title***	***Contact***	***First Aid – CPR - AED***	
			☐ **YES** ☐ **NO** ☐ **N/A**	
			☐ **YES** ☐ **NO** ☐ **N/A**	
SUB-CONTRACTOR PERSONNEL				
Company	***Name***	***Title***	***Contact***	***First Aid – CPR – AED***
				☐ **YES** ☐ **NO** ☐ **N/A**
				☐ **YES** ☐ **NO** ☐ **N/A**
Electrician Signature: (REQUIRED)		**Date:**		
BCCI Superintendent: (REQUIRED)		**Date:**		
Nearest Urgent Care Clinic & Medical Center				
Concentra				

NOTE: The entire MOP Package will be signed and forwarded to the BCCI Director of Safety within 24 hours of completion for closure of OPEN MOP.

23. LADDER SAFETY

A “Ladder’s Last” approach shall be used by the Competent Person during a Pre-Task Planning event to identify other means of access to include platforms to protect personnel and support safe use of the ladder and complete the task safely. There are other alternatives (e.g., Mobile Elevate Work Platform (MEWP), Scaffolds, Baker Staging, and Podium Ladders), which should be considered as plausible and preferred option. Ladders are to be used only after the Competent Person has determined there are NO other feasible method to perform the task.

- Do not use ladders with broken/dented or missing steps or rungs, broken or split side rails or other defects.
- Do not paint, repair, or alter any manufactured ladders.
- Trades shall have their name and only their employee use their own ladders.
- No Trades are allowed to used BCCI Construction, LLC ladders and equipment.
- Use A-frame ladders only in the open position, or per the manufacturer’s instructions.
- Secure straight ladders to avoid accidental displacement.
- Straight ladders on smooth surfaces must have slip resistant feet.
- Follow the manufacturer’s recommendations.
- Ladders shall be inspected for defects, red tag, and removed from service.
- All Ladder Manufacturer Labels and OSHA Markings are legible and visible.
- All workers shall be trained in use of ladders as specified by OSHA & Cal-OSHA.
- Ladders should be stored in a secure position.
- Do not separate extension ladders and use them as two ladders.
- Do not use aluminum ladders.
- Ladders shall extend at least three feet above the exit level.
- Use only rated portable ladders, at a minimum, Type 1 (Heavy Duty).
- Fall protection is required when working on a ladder placed closer to a guardrail than the height of the ladder.
- Do not use ladders in the horizontal position as platforms, runways, or scaffolds.
- Do not use planks and ladders to make a scaffold.

- Exit from an area for >25 employees or simultaneous two-way traffic requires a double ladder.

- The pitch of the ladder shall be such that the horizontal distance from the top support to the foot of the ladder is about 1/4 of the length of the ladder between the top support and the base.

TYPE IAA
375 LBS.
LOAD CAPACITY
INCLUDES WEIGHT OF USER PLUS MATERIALS

TYPE IAA: Professional use. Extra heavy duty. Capable of supporting 375 lbs.
USES: MRO and industrial construction.

TYPE IA
300 LBS.
LOAD CAPACITY
INCLUDES WEIGHT OF USER PLUS MATERIALS

TYPE IA: Professional use. Extra heavy duty. Capable of supporting 300 lbs.
USES: Roofing, building maintenance, contracting and industrial construction.

TYPE I
250 LBS.
LOAD CAPACITY
INCLUDES WEIGHT OF USER PLUS MATERIALS

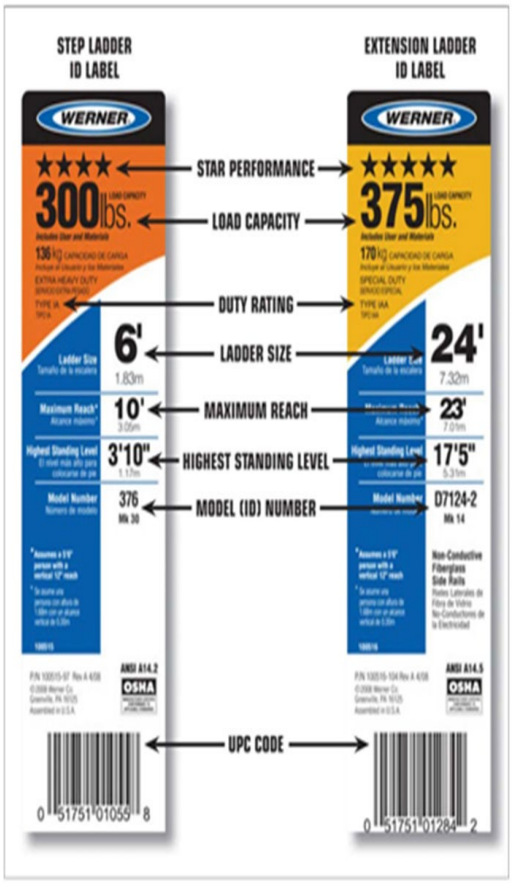
TYPE I: Industrial use. Heavy duty. Capable of supporting 250 lbs.
USES: Building maintenance, general contracting and sheet rock.

TYPE II
225 LBS.
LOAD CAPACITY
INCLUDES WEIGHT OF USER PLUS MATERIALS

TYPE II: Commercial use. Medium duty. Capable of supporting 225 lbs.
USES: Light commercial and general repair, painting and cleaning.

TYPE III
200 LBS.
LOAD CAPACITY
INCLUDES WEIGHT OF USER PLUS MATERIALS

TYPE III: Household use. Light duty. Capable of supporting 200 lbs.
USES: Light cleaning and painting.



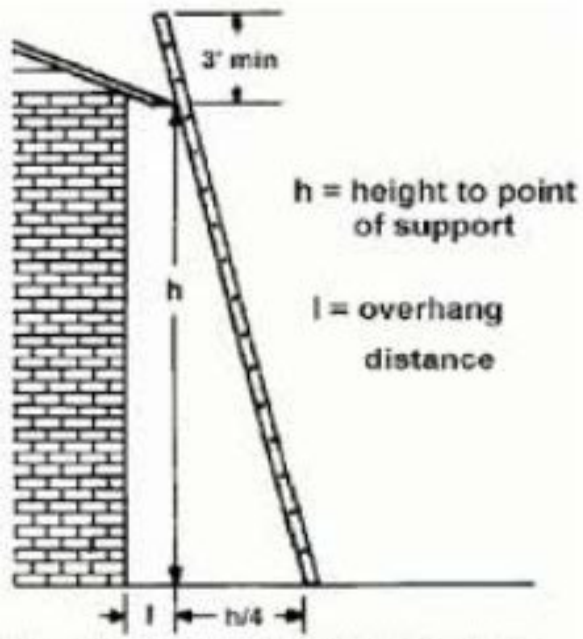


Figure 2. The base of a straight ladder should be one foot out of every four of height to the point of support

24.0 LASER SAFETY

LASER is an acronym for Light Amplification by Stimulated Emission of Radiation. The Laser produces an intense, highly directional beam of light. The common cause of laser-induced tissue damage is thermal in nature, where the tissue proteins are denatured due to the temperature rise following absorption of laser energy.

The human body is vulnerable to the output of certain lasers, and under certain circumstances, exposure can result in damage to the eye and skin. Research relating to injury thresholds of the eye and skin has been carried out to understand the biological hazard of laser radiation. It is widely accepted the human eye is almost more vulnerable to injury than the human skin.

Laser hazards are addressed in specific standards of the Construction Industry and are in *29 CFR 1926, Subpart D & E, Section 1926.54, 1926.102 (b) (2), and California Code of Regulations, Title 8, Sub-Chapter 4, Construction Safety Orders, Article 34, §1801, Non-Ionizing Radiation*.

CLASS	US: FDA/CDRH	IEC 60825 (AMENDMENT 2)
Class 1	• No known hazards during to eye or skin *during normal operation* • Note: Service Operation may require access to hazardous embedded lasers	
Class 1M	N/A	• No known hazards to eye or skin, unless collecting optics are used
Class 2a	• Visible lasers not intended for viewing. • No known hazards up to maximum exposure time of 1000 seconds	N/A
Class 2	• Visible lasers • No known hazard with 0.25 seconds (aversion response)	
Class 2M	N/A	• No known hazard with 0.25 seconds (aversion response) unless collecting optics are used
Class 3a	• Similar to Class 2 with the exception that collecting optics cannot be used to directly view the beam • Visible only	N/A
Class 3R	N/A	• Replaces Class 3a (with different limits) • 5 x Class 2 limit for visible • 5 x Class 1 limit for some invisible
Class 3B	• Medium-powered (visible or invisible) • Intrabeam and specular eye hazard • Generally not a diffuse or scatter hazard • Generally not a skin hazard	
Class 4	• High powered lasers (visible or invisible) • Acute eye and skin hazard intrabeam, specular and scatter conditions • Non-beam hazard (fire, toxic fumes, etc.)	

Laser Operations:

- Only Qualified and Trained Personnel will Operate Lasers
- The Laser Beam MUST be set-up above a persons normal line of sight.
- Warning Signs WILL be posted in areas where personnel are using lasers.
- All Lasers MUST be turned off when NOT in use.

- Lasers WILL NOT be left Unattended.
- Personnel SHALL NOT be exposed to any laser light intensities.
- Lasers on projects SHALL be mounted >96” as to NOT be directed into the eyes of personnel.
- Lasers will used <36” or lower, this is to prevent directing the laser in peoples’ eyes.
- Personnel using lasers MUST wear eye protection as per manufacturer’s operations manual.
- All eye protection MUST comply with the consensus standards of ANSI 87.1

25.0 SCAFFOLDNG SAFETY (PERRY, ERECTED, SWING STAGE, & ALUMINUM)

Scaffolding has a variety of applications. It is used in new construction, routine maintenance, renovation, painting, repairing, removal, and performing arts activities. Scaffolding offers a safer and more comfortable work arrangement compared to leaning over edges, stretching overhead, and working from ladders. Scaffolding provides employees safe access to work locations, level and stable working platforms, and temporary storage for tools and materials for performing immediate tasks. Scaffolding accidents mainly involve personnel falls and falling materials caused by equipment failure, incorrect operating procedures, and environmental conditions. Additionally, scaffolding overloading is a frequent single cause of major scaffold failure.

Scaffolds shall be erected, moved, dismantled, or altered only under the supervision of a competent person and will have guardrails and toe-boards installed. When scaffolding hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, Personal Protective Equipment (PPE), and proper training regarding Scaffolds will be implemented. These measures will be implemented to minimize those hazards to ensure the safety of employees and the public.

Erected Scaffolding erected under the direction of the General Contractor (GC), it is the responsibility of BCCI to ensure a Competent Person performs and documents the Daily Inspection of the scaffolding. Additionally, trades MUST provide BCCI proof of training prior to accessing the erected scaffolding and performing work. It is recommended to have the trade carrying the scope of work to carry the erected scaffolding in area of responsibility.

GENERAL REQUIREMENTS

- All components of a scaffold system shall be from a single manufacturer.
- Review major scaffolding projects involving multiple trades for proper buy-out, including inspections, alterations, and trainings.
- Trades using BCCI Construction, LLC scaffolding require waivers.
- Pre-planning may be required for scaffold usage, depending on the size and complexity of the scaffold.
- Training is required for all trades working on scaffolding in the elements specific to each scaffold.
- Erectors shall be trained and competent in scaffold erection.
- Trades shall submit a written assessment for providing fall protection during erection, dismantlement, and use.
- Scaffold erection for pedestrian protection shall be designed and inspected by a Registered Professional Engineer (RPE) and shall demonstrate adequate design capability to protect the public from anticipated overhead hazards and must be lite for hours of darkness.

- Scaffolds designed by an RPE shall be inspected by the RPE to verify scaffold was built as per design and specifications.
- Fully plank all working levels on an erected scaffold.
- Guardrail systems should be in place for scaffold >6’ and PFAS is required.
- A guardrail system shall consist of the following:
    - Handrail at 42” or X-bracing placed at 38”- 48” above work platform
    - Midrails at 21” or X-bracing placed at 20”- 30” above work platform
    - Toe boards are required.
- Protect erected scaffolds from electrical hazards and ground scaffolds as required.
- When erecting scaffolding within 20’ of energized electrical lines, a pre-planning meeting with a JHA is required.
- Erect no scaffold within 10’ of un-insulated power lines or only after the utility company has notification that the lines have been de-energized, relocated or insulated.

Uninsulated Line Voltage	Minimum Distance
300v to 50kv	3 feet
More than 50kv	10 feet plus .25 inches or each 1kv over 50kv

- The use of a tagging system is required on all scaffolds above one frame.
- The tagging system shall indicate green for fully compliant scaffolding; yellow for scaffolding which requires Fall Protection.
- Do not use scaffolding tagged red.
- When required, stair scaffold systems shall be engineered and stamped by a Registered Professional Engineer (e.g., trades or when the stairs are to be moved by a crane).

SUPPORTED SCAFFOLDS

- Place scaffold on mudsills and base plates.
- Per Scaffold Industry Association (SIA) Standards, feet are required on all scaffolds.
- Guy and brace scaffold at a 4:1 ratio where horizontal members support both inner and outer legs.

- The Scaffold Shall be erected plumb, level, and square.

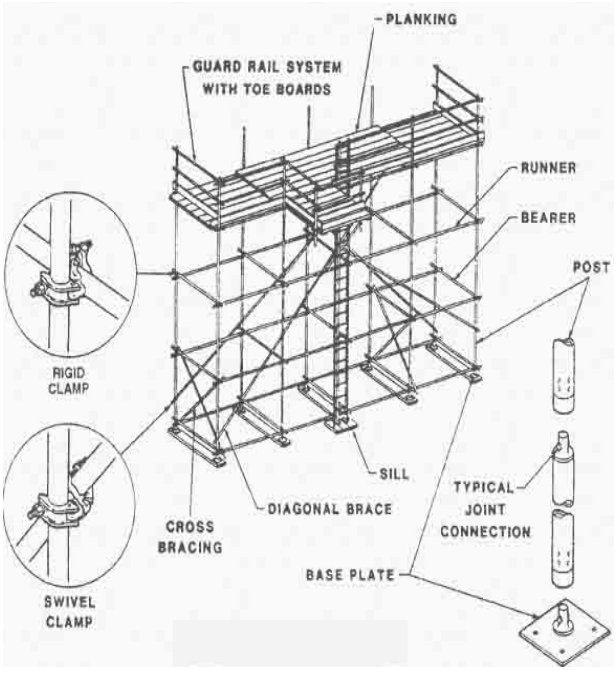
ROLLING / BAKER SCAFFOLDS

- To prevent racking, install horizontal diagonal bracing (except baker scaffolds) and any work >4’ the wheels MUST be LOCKED.
- Rolling scaffolds shall be securely pinned together and should always be fitted with horizontal diagonal bracing as recommended by the manufacturer.
- Scaffolds with working platforms >6’ in height guardrails are required per OSHA.
- Scaffolds on stairs or in stairwells shall have leveling base plates installed.
- Scaffolds with the working platform >6’ shall have a self-supporting ladder for access and shall have a swing gate to enter the platform.
- Scaffolds shall use outriggers when height of the working platform >4 times the base.
- All planking must be properly secured to prevent dislodging while in use.
- Do not use spackle buckets or a ladder on top of a scaffold.
- Baker type scaffolding with locking type picks is preferred.
- Trades shall not be permitted to ride scaffolds unless the floor remains clear of trash, material, debris, is free of floor openings and meets *29 CFR 1926.451(e)(7)(I)(ii)(iii)(iv)*.

SUSPENSION SCAFFOLDS OR SWING SCAFFOLDS

- Pre-Task Planning is required to determine the roof capacity, installation, counterweight formula, anchorage capacity, access, and other relevant issues.
- Before use, a Competent Person shall evaluate all direct connections.
- Counterweights shall be non-flowable and secured by a mechanical means to prevent displacement.
- Install tiebacks perpendicular to the face of the wall otherwise, two (2) tiebacks are required.
- Secure tiebacks to structural elements, which have been determined to withstand the dynamic load of the scaffold upon slippage.
- Inspect wire rope daily for damage.
- A minimum of three (3) double fisted/unisex wire rope clips shall be used according to the manufacturer’s recommendations and re-tightened to the manufacturer’s recommendations after the initial loading, while daily inspections required.

- Protect all wires and lifelines from damage and abrasion.
- Personal Fall Arrest System (PFAS) with vertical lifeline and rope grab system(s) are always required unless an equivalent Protective System is used.
- Do not use shock-absorbing lanyards with rope grabs.



26.0 TRENCHING AND EXCAVATING

Our construction activities occasionally require our employees to work within trenches and excavations. Each year in California; four construction workers die in trench cave-in mishaps. To prevent this from occurring; the following pre-cautions are mandatory when a BCCI employee(s) work within the confines of a trench or excavation which are deeper than five (5) feet. These requirements are also required in trenches less than five (5) feet in depth if the soil appears to be unstable. Additionally, these pre-cautions apply even if BCCI DID NOT dig the trench/excavation.

GENERAL PRECAUTIONS

- All trenching or excavation activities will be conducted in accordance with Cal/OSHA Regulations.
- All trenching or excavation work or entry will be supervised by a “Competent Person” with the skills, training, and experience to recognize hazards and implement corrective action(s).
- All trenches or excavations five (5) feet deep or greater will be protected from cave-ins by shoring (e.g., Sloping, shoring, or benching).
- NO personnel are permitted to work in any trench or excavation which is NOT safe. Work will STOP immediately until the hazard is corrected.
- All trenches or excavations will be inspected prior to the start of work and at least daily by the Competent Person.
- Suitable access and egress MUST be always maintained.

PRIOR TO DIGGING

- Any trenching or excavation >5’ deep; the trenching or excavation permit MUST be obtained from Cal-OSHA.
- The estimated locations of utilities (e.g., sewer, telephone, fuel, electric, water, etc.) or other underground installations, which reasonably may be expected to be encountered during excavation work, WILL be scanned for, and documented prior to opening a trench or excavation.
- Contact 811 (United States) a minimum of two (2) days prior to any off-site/on-site digging and notify all known owners of underground facilities in the area who are not members of the USA network. Any existing on-site utilities to remain will need to be notified prior to digging as USA will only mark out utilities on public space.

NOTE: Exception is when Emergency Repair Work is required for Underground Facilities or utilities.

WHILE DIGGING

- When trenching or excavation operations approach the estimated location of underground installations, the exact location of these installations shall be determined by safe and acceptable means.

- Contact with “LIVE” electrical lines and gas mains can cause death or serious injury. Extra pre-cautions should be taken in these locations. When unsure; request assistance from your Labor Foreman, Project Superintendent or BCCI Director of Safety.

- While the excavation is open; underground installations shall be protected, supported, or removed as necessary to safeguard personnel.

- All surface encumbrances which are located to create a hazard to personnel shall be removed and supported as necessary to safeguard personnel.

- Where the stability of adjoining buildings, walls, or other structures are endangered by the trenching or excavation operations; support systems (e.g., shoring, bracing, underpinning, etc.) shall be provided to ensure the stability of such structures for the safeguarding of personnel.

- Sidewalks, pavements, and appurtenant structures shall NOT be undermined unless a support system or another method of protection is provided to protect personnel from the potential collapse of such structures.

- NO personnel shall be permitted underneath any loads handled by lifting equipment.

- Personnel shall be required to stand away from any vehicle being loaded/unloaded to avoid being struck by spillage or falling materials.

- Adequate barriers or physical protection shall be provided at all remotely located excavations. All wells, pits, shafts, etc., shall be barricaded or covered. Upon completion of exploration and other similar operations, temporary wells, pits, shafts, etc., shall be back filled.

OPEN TRENCHES & EXCAVATIONS

- Daily inspection of trenches or excavations, adjacent areas, and protective systems shall be accomplished by a “Competent Person” for evidence (e.g., hazardous atmospheres and conditions, failure of protection systems, etc.), which could result in a possible cave-in(s). These types of inspections are more prevalent after a rainstorm or other hazard increasing events.

- When evidence of a situation is discovered for a potential cave-in(s); all personnel will be removed from the hazardous area until the necessary pre-cautions have been taken to render the area safe for work to resume.

- A stairway, ladder, ramp, or other safe means of egress will be in the trench or excavation, which is greater than four (>4’) feet or more in depth so as to require NO more than 25’ of lateral travel for personnel to egress.

- Locations where personnel or equipment are required or permitted to cross over the Trench or excavation over six (6) feet high and wider than thirty (30) inches; walkway and bridges with standard guardrails will be provided.

- Mobile equipment, which is operated adjacent to the trench or excavation, required to approach an edge, operator does not have a clear or direct view, or a warning system, a barricade system, mechanical signal or stop logs will be used.

- Adequate protection shall be provided to protect personnel from loose rock or soil which can pose a falling or rolling hazard from the excavation face. Protection methods consist of scaling to remove loose material, and the installation of protective barricades at intervals as necessary on the face to prevent falling or rolling material, or other equivalent protection means.

- Personnel shall be protected from excavated debris, other materials, or equipment which poses a hazard by falling or rolling debris into the trench or excavation. Protection will be provided by placing and keeping such materials or equipment at least two (2) feet from the edge of excavations, or using retaining devices which are sufficient to prevent materials/equipment from falling/rolling into excavations, or a combination of both.

- When Oxygen Deficient Atmospheres are present (atmosphere containing less than 19.5% oxygen) or the potential of a hazardous atmosphere (e.g., excavations in landfills, etc.) the atmosphere must be tested prior to personnel entering a trench or excavation greater than four (4) feet in depth.

- Adequate pre-cautions shall be taken to prevent exposure to an oxygen atmosphere deficient of 19.5% or other hazardous atmospheres through the use and provision of proper respiratory protection or ventilation.

- When mitigating controls are used to reduce the level of atmospheric contaminants to an acceptable level, testing will be conducted as often as necessary ensuring the atmosphere remains at a safe level.

- Rescue equipment (e.g., breathing apparatus, safety harness, lifeline, basket stretcher, etc.) are to be readily accessible when a hazardous atmosphere is present or may apparatus exist during a trenching/excavation project. This equipment shall be attended when in use.

- Personnel will NOT work in trenches or excavations where there is accumulated water or in these areas which water is accumulating, unless adequate pre-cautions have been taken to protect personnel. The pre-cautions vary in each situation to protect personnel, however, there is inclusion of special support/shield equipment to provide protection from cave-ins, water removal, or the use of a safety harness and lifeline.

- In the event water is controlled or prevented from accumulating through the use of removal equipment; this equipment and the operation MUST be monitored by a “Competent Person.”

- When excavation work interrupts the natural drainage of surface water (e.g., streams) diversion ditches, dikes, or other suitable means shall be used to prevent the surface water from entering the excavation and provide adequate drainage to the adjacent area of the excavation.

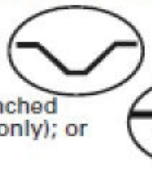
- Excavation which are subject to run-off from heavy rains will be required to be inspected by a “Competent Person.”

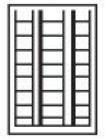
OSHA® QUICK CARD™

Working Safely in Trenches

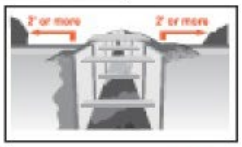
Two workers are killed every month in trench collapses. Each worker in a trench shall be protected from a cave-in by an adequate protective system. Some of the protective systems for trenches are:

- Sloped for stability; or
- Cut to create stepped benched grades (Type A or B soil only); or
- Supported by a system made with materials such as posts, beams, shores or planking and hydraulic jacks; or
- Shielded by a trench box to protect workers in a trench.





Excavated or other materials and equipment must be at least 2 feet back from the edge of a trench; and



A safe way to exit must be provided within 25 feet of workers in a trench.

A competent person must inspect trenches daily and when conditions change. An unprotected trench is an early grave. Do not enter an unprotected trench.

For more information:

OSHA® Occupational Safety and Health Administration
U.S. Department of Labor
www.osha.gov (800) 321-OSHA (6742)
TTY (887) 889-5627

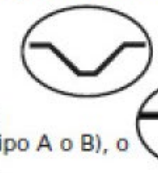
OSHA 3243-08R-11

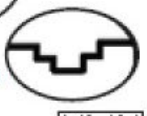
OSHA® DATOS RÁPIDOS

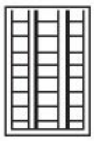
Trabajando de forma segura en zanjas

Dos trabajadores mueren cada mes en derrumbes de zanjas. Se utilizará un sistema adecuado para proteger a cada trabajador en una zanja de los derrumbes. Algunos de los sistemas de protección en zanjas son:

- Inclinación para lograr estabilidad, o
- Corte en forma de gradientes escalonados (sólo para el suelo del tipo A o B), o
- Soporte por un sistema hecho con materiales como postes, vigas, puntales o entarimado y gatos hidráulicos, o
- Resguardo en una caja de trinchera para proteger a los trabajadores en la zanja.







Los materiales excavados o de otro tipo y los equipos deben estar por lo menos a 2 pies hacia atrás del borde de la zanja.

Se deberá ofrecer una vía segura de salida dentro de 25 pies de los trabajadores en una zanja.

Una persona competente debe inspeccionar las zanjas a diario y cuando las condiciones cambien. Una zanja sin protección es una tumba. No entre a una zanja que no está protegida.

Para más información:

OSHA® Administración de Seguridad y Salud Ocupacional
Departamento del Trabajo de EE.UU.
www.osha.gov (800) 321-OSHA (6742)

Subsurface Installations' the approximate location of subsurface installations, (e.g., sewer, telephone, fuel, electric, waterlines) or any other subsurface installations which may be reasonably expected to be encountered during any or all excavation work, shall be determined by the excavator prior to opening an excavation.

An Excavation shall not commence until:

- The excavation area has been marked as specified in Government Code Section 4216.2 by the excavator.

- The Excavator has received a positive response from all known owner/operators of subsurface installations within the boundaries of the proposed project. These positive responses confirm the owner/operators have located their installations and said responses wither advise the excavator of the subsurface locations or advise the excavator the owner/operator does not operate a subsurface installation which would be affected by the proposed excavation.

Only Qualified Person shall perform subsurface installation locating activities, and all such activities shall be performed in accordance with *Government Code Section 4216 and 4216.9*.

Employees who are involved in the excavation operation and exposed to the hazards of the excavation operation are to be trained in the excavator notification and excavation practices.

During the excavation, all subsurface installations shall be protected, supported, or removed, as necessary to ensure the project team is safeguarding all employees working on the project site.

A stairway, ladder, ramp, or other safe means of egress shall be in trenching excavations which are 4 feet or more in depth to require no more than 25 feet of lateral travel for personnel.

While working next to or in vehicular traffic, all employees will display and wear, high-visibility-reflective vests. Warning systems for mobile equipment being operated in the excavation, the operator who does not have a clear or direct view of employees, a warning system will be utilized (e.g., barricades, hand, or mechanical signals, or stop logs).

An excavator discovering or causing damages to a subsurface installation shall immediately notify the General Contractor, Facility Owner, or contact the Regional Notification Center to obtain subsurface installation operator contact information immediately. All breaks, leaks, nicks, dents, gouges, grooves, or other damages to installation's lines, conduits, coatings, or cathodic protection shall be reported to the subsurface installation operator. If damage is done to a high priority subsurface installation which results in the escape of any flammable, toxic, or corrosive gas or liquid or endangers life, health, or property, the excavator responsible is to immediately notify the General Contractor and 911.

Employees shall not work in excavations in where there is water accumulated water, or in excavations in which water is accumulating, unless adequate precautions have been taken to protect employees against the hazards posed by water accumulation. The precautions necessary to protect employees adequately vary with each situation but could include special support or shield systems to protect cave-ins, water removal to control the level of accumulating water, or use of a safety harness and lifeline. If water is controlled or prevented from accumulating using water removal equipment, the water removal equipment and operations shall be monitored by a competent person to ensure proper operation.

Adequate protection shall be provided to protect employees from loose rock or soil which could pose a hazard by falling or rolling from an excavation face. Such protection shall consist of scaling to remove loose material; installation of protective barricades at intervals as necessary on the face to stop and contain falling material; or other means providing equivalent protection. Employees shall be protected from excavated or other materials or equipment which could pose a hazard by falling or rolling into excavations. Protection shall be provided by placing and keeping such materials or equipment a minimum of 2 feet from the edge of excavations or using retaining devices which are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both when necessary.

Daily inspections of excavations, the adjacent areas, and protective systems shall be made by a Competent Person for evidence of a situation which could result in possible cave-ins, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions. An inspection shall be conducted by the Competent Person prior to the start of work and as needed throughout the shift. Inspections shall also be made after every rainstorm or other hazard increasing occurrence. These inspections are required daily, the excavation form completed and uploaded into ProCore.

Upon discovery of a situation which could results in a cave-in, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions, the Competent Person shall remove the exposed employees from the hazardous area until the necessary precautions have been taken to ensure their safety.

In the event employees or equipment are required or permitted to cross-over excavations over 6-Feet in depth and wider than 30” inches, the following shall be provided: walkways or bridges with standard guardrails.

Adequate physical protection barriers shall be provided at all remotely located excavations. All wells, pits, shafts, etc., shall be barricaded and covered. Upon completion of exploration and other similar operations, temporary wells, pits, shafts, etc., shall be backfilled.

To conduct the following activities, the employer shall hold an Annual or a Project Permit, and may apply for either:

- Construction of trenches or excavations 5’ Feet or deeper into which any person is required to descend.

NOTE: For purposes of “Descend” means to enter any part of the trench or excavation once the excavation has attained the depth of 5’ Feet or more.

- Erection and placement of scaffolding, vertical shoring, or falsework intended to be more than 36’ Feet in height upon completion.

DAILY EXCAVATION CHECKLIST

DAILY EXCAVTION SHEET							
PROJECT:				**LOCATION:**			
COMPETENT PERSON:				**WEEK:**			
SOIL TYPE / PROTECTIVE SYSTEMS (Check Box Which Applies) **IDENTIFY SOIL TEST METHOD: _____**							
☐ **TYPE A SOIL** ☐ **TYPE B SOIL** ☐ **TYPE C SOIL** ☐ **SLOPING** ☐ **BENCHING** ☐ **SHORING** ☐ **SHIELDING**							
Y = YES / N = NO / NA = NOT APPLCIABLE	**M**	**T**	**W**	**TH**	**F**	**S**	**SU**
Is the cut more than 4 feet in depth?							
Is the cut more than 20 feet in depth?							
If so, Approved by Registered Professional Engineer?							
Excavation Face Free of Cracks?							
Means of Egress Every 25 Feet?							
Are Adjacent Structures Stabilized?							
Is there exposure to Vehicular Traffic / Mobile Equipment?							
Does the Mobile Equipment have Warning Systems?							
Is the Excavation Properly Barricaded?							
Is there Water in the Cut?							
Is there Equipment Operating in the Cut?							
Is there a Potential for a Hazardous Atmosphere? *							
Has Atmospheric Monitoring been Accomplished?							
Is the Spoil 2’ or more away from the edges of the excavation?							
Does the shield extend a min of 18” above surrounding areas?							
Is depth of the cut more than 2’ below the bottom of shield?							
Are walkways over excavation 20” wide & 2’ past both edges?							
Are walkways equipped with Guardrails?							
Is Emergency Equipment Required?							
**** If Yes; operation must operate under Confined Space***							

Please indicate any corrective action items from above list:	**CORRECTED BY**	**DATE**

EMPLOYEE NAME (Printed)	**Employee Signature**	**DATE**

27.0 STEEL ERECTION

The erection subcontractor shall develop a site-specific erection plan which includes the name of the Qualified Rigger, Qualified Signal Person, and “Competent Person.”

Conduct a Pre-Planning meeting with the steel erector, crane operator, and other trades as necessary before the start of the job. Coordination of overhead loads is critical.

All ironwork activities to follow the six (6) foot rules with hard barriers or Personal Fall Arrest Systems (PFAS).

The steel erector is NOT to erect steel unless a written notification has been received indicating the concrete in the footings, piers and walls or the mortar in the masonry piers and walls has attained either 75% of the intended minimum compressive design strength or sufficient strength to support the loads imposed during steel erections.

Submit documentation to BCCI Construction, LLC Project Team, and BCCI Director of Safety in writing.

- BCCI Construction, LLC is to ensure adequate access to roads and laydown areas are firm, properly graded, drained, and readily accessible for the safe storage and operation of erector’s equipment.
- Do not create and watch for overhead hazards.
- A minimum of two (2) bolts will be used to connect all steel pieces.
- Metal Decking will NOT be laid unless decking can be secured by the end of shift.
- All Hot Work Permits are issued by and procured from the BCCI Superintendent.
- Install Wire Rope Cable at the perimeter for Top and Mid Rail with High Visibility Flags Every Six (6) Feet and provide cables with turnbuckles at each elevation to facilitate maintenance. Two (2) cable clamps are required at each column and at the end of a run.
- Maintain Wire Rope Cable used for Guardrail System to meet 42” inches (+3”) above floor with 200 pounds exerted in the downward and outward direction.
- Wire Rope Cable System:
    - Use a minimum of 3” inch by 3” inch steel angle iron post.
    - Minimum of ¼” cable, flagged every six (6) feet, with top rail at 42” inch above finished floor.
    - Maintain a deflection of less than 3” inches with posts located at intervals to maintain cable deflection requirements.
    - Install turnbuckles at regular intervals, at least one per change of direction and

length of cable and NOT to exceed four (4) bays in 120’ feet.

- Install Cable Clamps at each column to prevent a cable from loosening and deflected around the entire perimeter.
- Install a minimum of two cable clamps at the end of each run.
- Posts or point of attachment to be at 42” inches (+3” inches) above the top of slab to compensate for over-pours, deflections, or other discrepancies, which may lead to the cable being lower than 42” inches at any time.
- DO NOT use Wire Rope Cable Systems as anchorage points unless designed with tabulated data from a Registered professional Engineer and submitted to Project Team and Director of Safety for review.
- Install Post Kickers at every change of direction and runs for angle iron post. Trades must provide training on OSHA Subpart R and for other activities such as 6-foot fall protection, scaffolds, ladders, excavations, etc.

Workers cannot climb or slide columns, unless connecting.

Install protection at all deck openings as decking installation is in progress.

Safety Nets are not accepted as a means of fall protection.

Once steel erection of a floor/area is completed and the area scheduled for turnover to other trades such as the concrete contractor, the area is first inspected by the BCCI Construction, LLC Project Team to assure the fall protection is installed correctly; all debris and trip hazards have been removed. Following the inspection of the floor/area, a Custody of Fall Protection letter shall be drafted and sent to all contractors on the jobsite.

Trades are responsible to inspect all work areas daily and report any discrepancies or findings to the BCCI On-Site Superintendent immediately.

29 CFR 1926 Subpart R, Appendix A, shall be required for crane erection and dismantling at the discretion of safety department.

28.0 FIRST AID, CPR, AED, AND BLOODBORNE PATHOGENS

PURPOSE / SCOPE

The purpose of this program is to establish guidelines for BCCI Construction, LLC with regards to First Aid, CPR, and AED as prescribed with the Occupational Safety and Health Administration Medical and First Aid Standard (*29 CFR 1910.151*). This program applies to BCCI Field Operations, Project Management, and Emergency Response Teams at each office location.

RESPONSE POLICY

BCCI Construction, LLC ensure compliance with the OSHA First Aid Standard (*29 CFR 1910.151*) requires trained First Aid Providers at all workplaces of any size if there is NO "Infirmary, Clinic, or Hospital in near proximity to the workplace, which is used for the treatment of all injured employees."

In addition to first aid requirements of *29 CFR 1910.151*, several other referenced OSHA Standards (*29 CFR 1910.269 and 29 CFR 1910.146*) requires training in Cardiopulmonary Resuscitation (CPR) due to sudden Cardiac Arrest (e.g., asphyxiation, electrocution, exertion, seizures, stroke, etc.) may occur. For these reasons and others, we (BCCI) have identified employees which are expected to render First Aid, CPR, & AED as part their job duties. They are also covered by the requirements of the Occupation Exposure to Bloodborne Pathogens Standard (*29 CFR 1910.1030*). Our employee receives their training from our Director of Safety, who is a Certified Bloodborne Pathogen, First Aid, CPR, AED Instructor.

DEFINITIONS

Automated External Defibrillators (AEDs) – A portable electronic device designed to assess the heart's rhythm and, if needed, automatically recommend whether an electric shock is required and needed to be delivered to correct the heart rhythm.

Cardiopulmonary Resuscitation (CPR) – An Emergency Lifesaving Procedure performed when the heart stops beating.

First Aid – A form of Medical Attention which is usually administered immediately after an injury and at the location of occurrence.

ROLES & RESPONSIBILITIES

Director of Safety & Safety Coordinator – Responsible for:

- Ensures a Written Program is in place.
- Review Program periodically and monitors to ensure compliance.
- Ensure personnel receive appropriate training and training is documented.

Managers & Supervisors – Responsible for:

- Ensuring personnel comply with the guidelines established by this program.
- Ensure personnel comply the required training.
- Ensure First Aid Kits on project sites and offices are supplied and stocked.

Personnel – Responsible for:

Comply with requirements of this program.

Complete the required initial and recertification training sessions.

IMPLEMENTATION

First Aid –

OSHA refers to First Aid as Medical Attention which is usually administered immediately after the injury occurs and at the location of the occurrence. This consists of a one-time, short-term, treatment and requires little technology or training to administer. The previous referenced form of treatment consists of cleaning minor lacerations, abrasions, contusions, or scratches; treatment of minor burns; the application of bandages and dressings; the use of non-prescription medication, removing debris from eyes, massage, choking, drinking fluids to relieve heat stress. At BCCI Construction, LLC, only trained personnel are authorized to administer first aid.

Injured personnel are transported via local emergency services or a co-worker dependent on the type of injury to the nearest clinic for assessment and treatment beyond First Aid. However, if a serious injury is sustained, Local Emergency Services (Fire, Medical, and Police) are called and the injured employee is then transported to a local hospital for further treatment and assessment.

First Aid & Eyewash Kits are located throughout all BCCI Construction, LLC project sites, shops, and office locations, and will be adequately supplied in accordance with the American National Standard (ANSI) Z308.1-1998 “Minimum Requirements for Workplace First Aid Kits.” All First Aid and Eyewash Kits are inspected weekly and adequately stocked; however, if the First Aid & Eyewash Kit is used supplies to restock are onsite to ensure compliance.

Cardiopulmonary Resuscitation (CPR) –

The American Health Association refers to Cardiopulmonary Resuscitation (CPR) as an Emergency Lifesaving Procedure performed when the heart stops beating. At BCCI Construction, LLC only trained personnel are authorized to administer CPR.

Automated External Defibrillators (AEDs) –

The American Health Association refers to an Automated External Defibrillator (AED) as a lightweight, portable device which delivers an electric shock through the chest to the heart. AEDs are mounted in selected locations in all the geographic office locations (Refer to Table). At BCCI Construction, LLC only trained personnel are authorized to utilize the AED.

Office	*Serial #*	*Location*	*Pad Exp Date*	*Battery Changed*
San Francisco	D0000150229	L2 Copier Room	04.28.2024	11.14.2020
Silicon Valley	D0000150142	L1 Copier Room	04.28.2024	11.14.2020
Los Angeles	D0000204616	L19 Copier Room	09.28.2023	11.14.2020
Orange County				

INFORMATION AND TRAINING

Personnel must be trained prior to administering First Aid, CPR, and AED. Training will be presented in accordance with American Health Association and EMS Safety guidelines or other nationally recognized programs.

Personnel are provided initial and refresher training as certification are only good for two (2) years. Personnel are scheduled to complete their refresher training at least 45 days prior to their expiration date. Initial training sessions are offered throughout the year and newly hire personnel are inserted into a class. All training sessions are in a classroom setting with training mannequins and other hands-on training, with practical exercises, which personnel must perform to demonstrate they understand the training material.

RECORDKEEPING

The Safety Division issues Certification Cards, maintains copies and documents training on the safety training matrix. Additionally, training is logged electronically in EMS/ HIS Platform. This is applied to all First Aid, CPR, and AED training received by Field Operations, Project Managers, and Emergency Response Team.

NOTE: ALL Training Records are available upon request. All training records are maintained at the Corporate Office in San Francisco, CA. In Addition, ALL Training Records are Available Upon Request.

29.0 OSHA 10 & 30 REQUIREMENTS AND TRAINING

OSHA 10 – Cal-OSHA also referred to as the Division of Occupational Safety and Health (DOSH), requires workers to complete this training to learn how to prevent workplace hazards, accidents, injuries, and fatalities. In this course personnel are taught to prevent the most common of safety hazards (e.g., struck by, caught in, falls, and electric shock) commonly referred to as the Focus Four.

OSHA 30 – Cal-OSHA 30 training is designed for supervisors and managers in the construction industry and charges them with certain safety responsibilities and provides them with enhanced knowledge in the OSHA Focus Four (e.g., falls, electrocution, struck by, and caught in). Other detailed subjects are covered to provide personnel with enhanced knowledge on how to handle and deal with these types of hazards when they arise.

BCCI Construction, LLC Requires the following personnel:

Minimum of OSHA 10 Hour (Construction):

- Project Managers and Assistant Project Managers
- Project Engineers
- Lead Laborers and Laborer Foremen
- Safety Committee Members (representatives of all departments)

Minimum of OSHA 30 Hour (Construction):

- Senior Director Field Operations & Director Field Operations
- Field Operations Managers
- Senior Superintendents & Field Superintendents

TRAINING

The Director of Safety – Matty Kernen and Safety Coordinator – Tony Fisher are OSHA 10- & 30-Hour Construction certified instructors, which develop a schedule of training and instruct these courses to BCCI Construction, LLC personnel.

Upon completion of training, the Safety Division submits the criteria and rosters of all classes instructed to an OSHA Outreach Training Institute (Los Positas Community College, Pleasanton, CA) for issuance of cards. Once received, the Safety Division personally delivers within the 30 days allotted. All training is tracked in Microsoft One Note & Microsoft Excel (Training Matrix) and on the shared drive, commonly referred to the “X Drive.”

All training records are available upon request.

30.0 HAZARD REPORTING (IDENTIFICATION & REPORTING)

The goal and purpose of Hazard Identification is the identification and evaluation of unsafe work procedures, conditions, and practices as to aid the prevention of mishaps, near misses, and job-related illnesses. The objective with hazard assessments and inspections is to eliminate or with hierarchy of controls mitigate risk. The principal approach to risk mitigation and reduction of mishaps and near misses are with periodic scheduled and no-notice inspections, coaching, mentoring, education, training, and immediate reporting of identified hazards.

All personnel will be responsible for the continuous and on-going inspection of the workplace. When potentially hazardous conditions are discovered, they shall be corrected or mitigated immediately at the lowest level possible. The following identified personnel regardless of the duty title are responsible for the performance and documentation of workplace inspections:

BCCI Labor Foremen	BCCI Superintendents	BCCI Director of Safety
BCCI Project Managers	BCCI Safety Coordinator	BCCI Field Operations Managers

INSPECTIONS:

An essential part of managing the effectiveness of our safety program is to perform and document project and office inspections. Our inspection program is a positive tool in the elimination of hazards and a communicative catalyst of findings and observations throughout the project, company, trades, etc., to aid in prevention of recurrence and ensure consistency throughout the company and workforce.

Routine inspection of the project should be performed weekly by the Project Manager, Superintendent, or Labor Foreman to identify, address, correct, or mitigate the identified hazards discovered during this routine inspection. If any hazard which cannot be corrected or mitigated at the lowest level possible, then they are immediately report the Hazard to the BCCI Director of Safety or Safety Coordinator. BCCI has instituted a QR Code process for any one person on the project to report a hazard anonymously without fear of reprisal or coercion. These reports go directly to the BCCI Safety Division for investigation or action. In addition, the BCCI Hazard Report is available for completion and submission. Additionally, these routine inspections identify unsafe conditions, processes, and procedures, which when addressed provide a safe and healthful work environment.

DOCUMENTATION OF INSPECTION:

All inspections (formal or spot) performed require documentation with all findings, corrective actions, and recommendations. Safety checklists are available electronically through ProCore and utilized to ensure compliance. The above listed personnel will utilize the Safety Checklists to perform their inspections. The following guidelines to document inspection of the workplace or jobsite are as follows:

- Project Personnel will perform Daily Inspections and annotate in their Daily Logs.
- Project Inspections shall occur prior to the start of the work shift to ensure compliance.
- When a process, procedure, or equipment changes in the work environment.

- Newly identified hazards because of process, procedures, work environment change.

SAFETY AND INTERNAL AUDIT:

The Safety Division will assist supervisors in the identification and correction of potential hazards, as they conduct inspections and surveys of the jobsite or workplace by documenting the finding with pictures; then supplies a recommendation to correct the finding and await the corrective action taken to close the report.

All completed inspection reports are to be forwarded to the Project Team for immediate action, and when sub-contractors are in violation of compliance; the findings identifying the sub-contractor are forwarded to the specific sub- contractor safety personnel for immediate action and cross-tell. This action is to aid in the unification of Safety at the workplace or project.

OUTSIDE AGENCY INSPECTIONS:

There are outside agencies who conduct regular, periodic inspections throughout all our geographically established projects and offices, which assist in achieving some of our inspectional responsibilities under this IIPP. These agencies include:

- City and County Building Inspectors.
- City and County Fire Marshal's Office.
- City and County Fire Departments.
- State and Federal Occupational Safety & Health Administration.
- City and County Department of Public Health & Environmental.

RECORDKEEPING OF INSPECTIONS:

The Project Team and Safety Division shall maintain records of scheduled and no-notice safety inspections of unsafe conditions, processes, procedures, and non-compliance for a minimum of two years (unless otherwise specified). These records include:

- The individual conducting the inspection.
- Any description of the unsafe conditions, processes, procedures, and work practices.
- Documentation is maintained electronically through ProCore and on the Shared Drive.

BCCI HAZARD REPORT

HAZARD ***(to be Completed by Individual Report Hazard)***		
HAZARD REPORT NUMBER: (Assigned by Director of Safety or Safety Coordinator)		
TO: BCCI DIRECTOR of SAFETY	FROM: (*Name Optional*)	
LOCATION: (*Project & Location on Project*)		
DESCRIPTION of HAZARD: (*Date, Time, Summary, Who, What, Where, When, & How*)		
RECOMMENDATIONS: (*Not Required – However Encouraged*)		
DATE RECEIVED:	DIRECTOR of SAFETY:	SIGNATURE of DIRECTOR of SAFETY - SAFETY COORDINATOR:

31.0 JOB HAZARD (JHA), JOB SAFETY (JSA) AND PRE-TASK PLANNING (PTP)

All trades are responsible for conducting a Pre-Task Plan (PTP), Job Hazard (JHA), or Job Safety Analysis (JSA) at the start of each workday. All workers are required to attend. In the event a worker arrives late the foreman shall be responsible to ensure the PTP, JHA, or JSA is reviewed and understood.

Trades must use their own company PTP, JHA, or JSA form and submit to the Project Superintendent and Director of Safety.

The minimum information represented shall include the following:

- Date
- Company Name
- Supervisor's Name
- Who is completing the PTP, JHA, or JSA (if different than supervisor)
- List of tasks to be performed
- List of hazards associated for each task
- List of tools and equipment required for each task
    - Identify if training is required.
    - Ensure certificates of license are current (if applicable).
- Personnel assigned to each task
    - Review experience and knowledge of task and adequate number of personnel.
- Review jobsite conditions
    - Lighting, Access, Hazards, Weather.
    - Other trades working in area.
- Sign-In form for attendees (First Last Name, Signature).
- Miscellaneous Information or Comments.

32.0 ACCIDENT, EXPOSURE, INCIDENT REPORTING AND RECORDKEEPING

The “Prompt” reporting of a mishap or near-miss is crucial to the response, investigation, and prevention of future mishaps, near misses, and work-related illnesses. This immediate reporting affords the Safety Division to properly perform a safety investigation to determine the root cause of the event and develop plausible recommendations to prevent the recurrence. There is NO claim, loss, damage, or incident too small where it does NOT warrant reporting. When an employee during the performance of their duties sustains a mishap or illness requiring medical care, the Responsible Person listed below shall conduct a thorough safety investigation:

Matty Kernen, Director of Safety
BCCI Construction, LLC, 1160 Battery Street, Suite 250, San Francisco, CA 94111
(415) 264-3840, matty.kernen@bcciconst.com

Tony Fisher, Safety Coordinator
BCCI Construction, LLC, 1160 Battery Street, Suite 250, San Francisco, CA 94111
(415) 265-2593, tony.fisher@bcciconst.com

SERIOUS INJURIES/ILLNESSES OR FATALITIES:

California Occupational Safety & Health Administration (Cal-OSHA) in accordance with *California Code of Regulations; Title 8, Section §330 (h)* defines an injury or illness as serious if; “*any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.*”

All personnel shall follow the following process when notification of mishaps:

- Notify BCCI Director of Safety at (415) 264-3840 to report Serious Injury/Fatality mishap.
- BCCI Director of Safety or Safety Coordinator immediately responds to mishap scene.
- BCCI Director of Safety will immediately notify Cal-OSHA within 8 hours of the mishap
- Other incidents may be reported to Cal-OSHA on a case-by-case basis

NOTIFICATIONS PROCESS

All mishap and near-miss reporting will comply with the BCCI Code of Safe Work Practices (Safety Manual). All reports will include the Mishap / Near-Miss report, Sub-Contractor Mishap Report, Doctor’s Release back to duty, and any other required Workmen’s Compensation Carrier forms to include Cal-OSHA. Refer to the Project Health and Safety Plan (HASP).

Documentation Required for Injury Reports:

- BCCI Mishap / Near-Miss Report.
- Trade Mishap / Near-Miss Report (if applicable).

- Doctor’s Release Back to Duty Documentation.
- Any Restricted Duty Documentation.
- Witness Statements (if applicable).
- All documents submitted as one package within 24 hours of occurrence

Documentation for Near-Miss Reports:

- BCCI Mishap / Near-Miss Report.
- Trade Report.
- Witness Statements (if applicable).
- All documents submitted as one package within 24 hours of occurrence.

ON-SCENE PROCEDURES

- Step 1: Administer First Aid and seek Medical Attention as soon as possible to the injured person. Protect the injured person from any hazard, which could worsen their condition. NOTE: If the mishap in a non-emergency; contact On-Site Health & Safety to provide treatment.
- Step 2: Immediately call “911” when the mishap is of serious nature; then notify Director of Safety, who in turns notifies upper management and Senior Leaders.
- Step 3: BCCI Senior Leaders or an authorized representative will be present prior to speaking to anyone if the mishap is of a serious nature. Never speak to the media or Non-BCCI Personnel about the mishap and refer all questions to BCCI Senior Leaders.
- Step 4: Never sign any documentation about the incident and defer to BCCI Senior Leaders when requested.

If you are injured on-duty, you have the responsibility to notify your supervisor immediately prior to seeking medical attention at all possible. It is of utmost importance to report all job-related injuries to you Supervisor and Director of Safety. If you are involved or a witness to a mishap cooperate with your supervision of safety division and assist with the determination of the causal factor in the mishap. The observations translated or relayed are critical in assisting investigators in providing plausible recommendations to prevent recurrence.

Minor incidents (e.g., slips, trips, falls, near-miss, first aid, etc.) occur, even when there is no injury or damage; these incidents must be reported to you supervisor for the proper safety investigation and correction to include trend analysis.

BCCI will conduct a thorough investigation of all mishaps and near-misses. Supervisory personnel will be primarily responsible for performing a safety investigation of all mishaps and near-miss in their Area of Responsibility (AOR). The Superintendent, Safety Division,

Management, and Insurance Company Representative will investigate any type of mishap involving a fire, fatality, serious injury, or extensive property damage.

The primary goal of a mishap investigation is preservation of personnel and assets, while attempting to prevent the recurrence of the mishap. This is accomplished through findings, causal findings, and recommendations produced from the investigation. After an employee sustains an injury at the workplace or project, the Superintendent is responsible for initial action of first aid treatment or obtaining professional medical attention (e.g., clinic or local emergency responders) as soon as possible; while preserving and protecting other personnel and equipment from further injury or damage. The Superintendent or Supervisor shall investigate the circumstances surrounding the incident or mishap.

Our Safety Division, Safety Committee, and Project Management Teams will review all mishap and near miss investigations. The Safety Committee is tasked with this review and develops a “Lessons Learned” document to disseminate throughout the company.

RETURN TO DUTY

All personnel seeking to “Return to Duty” must provide documentation from their doctor stating they are fully cleared to work or placed on “Restricted Duty.” Personnel must provide this documentation to their Superintendent or immediate Supervisor, who then provides a copy to the Director of Safety and Human Resources. BCCI Management must approve all personnel returning to work. When personnel want to return to work without the proper documentation from a doctor, under NO circumstances will BCCI Construction, LLC, allow an employee to “Return to Duty” without the proper release documentation. There are NO exceptions.

INCIDENT – ACCIDENT – NEAR MISS REPORT FORM

For First Aid or Minor Injury complete all the Highlighted Areas on these Pages. Any injuries which require more than First Aid, remaining items by Supervisor via Employee Interview.

Project Name:	**Job Number:**	**Superintendent:**
Employee Name:	**Date of Mishap / Near Miss:**	**Time of Mishap / Near Miss:** ☐ am ☐ pm
Occupation:	**Company:**	
Mishap Occurred in Which Department:	**Location of Mishap / Near Miss:**	
Was there Property Damage: ☐ Yes ☐ No ☐ Not Applicable	Property Management Company:	
Were there any Witnesses to the Mishap? ☐ Yes ☐ No *If Yes, Immediately Interview each Witness using the Witness Statement Form*	If Yes, List Names of Witnesses: 1. 2.	
Mishap Reported to (name):	**Date Reported:**	**Time Reported:** ☐ **am** ☐ **pm**
Who was in-charge at the time of the Mishap / Near Miss?		
Name of Person Completing Report:		**Date:**
Supervisor's Name:		**Telephone:**

Supervisor's Description of Events:
Supervisor: Interview Employee; then describe what happened (Who, What, When, Why, and How)

BODY PART INVOLVED – Check all which apply. Please Circle (R) or Left (L)			
Head Injury	***Trunk Injury***	***Upper Body***	***Lower Body***
☐Head	☐Shoulder R or L	☐Upper Arm R or L	☐Hip R or L
☐Face	☐Upper Back	☐Forearm R or L	☐Leg R or L
☐Eye R or	☐Middle Back	☐Elbow R or L	☐Thigh R or L
☐Nose	☐Lower Back	☐Wrist R or L	☐Knee R or L
☐Ear R or L	☐Chest	☐Hand R or L	☐Calf R or L
☐Neck	☐Rib R or L	☐Finger(s) – Identify	☐Ankle R or L
☐Skin	☐Abdomen	☐ Thumb L or R	☐Foot R or L
			☐Toe(s) - Identify

NATURE of INJURY - - *Check all Which Apply*			
☐Abrasion-Contusion ☐Bruise ☐Cut – Laceration ☐Puncture ☐Foreign Object	☐Burn-Heat ☐Burn-Chemical ☐Exposure-Heat/Cold ☐Exposure-Chemical ☐Exposure-Haz-Mat	☐Inhalation ☐Poisoning ☐Allergic Reaction ☐Skin Problem	☐Sprain/Strain ☐Fracture ☐Repetitive Motion ☐Broken ☐Other (Specify)

CONTRIBUTING FACTORS	**Describe Conditions Causing the Mishap/Near Miss**
☐Lifting/Picking-Up Materials or Equipment ☐Loading/Unloading Materials or Equipment ☐Pushing/Pulling Materials or Equipment	Describe:
☐Slip, Trip, of Fall ☐ Wet Surface ☐Object(s) Left on Floor ☐ Uneven Surface ☐Damaged / Frayed Carpet /Flooring ☐Ascending / Descending Ladder or Stairs	Describe:
☐Struck by or Against Object(s) ☐Falling Item ☐ Another Person	Describe:
☐Cut / Puncture ☐ SHARPS / Knife / Material ☐Hand Tool or Machinery ☐ Other Object	Describe:
☐Other:	Describe:

CAUSE – *Check all Which Apply*			
☐Poor Awareness ☐Complacency ☐Fatigue ☐Body Mechanics ☐Horseplay ☐Poor Ventilation ☐Fixation ☐Electrical Exposure	☐Broken Equipment ☐Improper Equip Use ☐Confusion ☐Improper PPE ☐Falling Objects ☐Flame, Fire, Smoke ☐Physical Impairment ☐Building / Structure	☐Floor Wet ☐Floor Uneven ☐Rushed ☐Furniture / Fixtures ☐Hand Tools ☐Distraction ☐Poor Housekeeping ☐Dehydration	☐Stairs ☐Ladder Misuse ☐Railings ☐Struck By / Against ☐Unsafe Act ☐Unsafe Condition ☐Lack of Training ☐Overconfidence

PREVENTION List Corrective Actions	**Responsible Person**	**Date Assigned**	**Date Completed**

RECORDKEEPING - - To be completed by Director of Safety		
Is this OSHA "Recordable" ☐Yes ☐ No (OSHA 300 Log)	Is this OSHA "Reportable" ☐ Yes ☐ No	If Yes, Date OSHA Notified
Supervisors Signature:		
Director of Safety Signature:		
Date to Safety Committee:		

EMPLOYEE REFUSAL OF MEDICAL TREATMENT FORM FORMULARIO de RECHAZO de TRATAMIENTO MEDICO del EMPLEADO

Use this form if an employee has a minor injury and they do not feel they need medical treatment. If the injured employee injuries are obvious; seek medical attention and/or call On-Site Health & Safety or 911. Remember to complete the Mishap/Near-Miss form.

Utilice este formulario si una empleado sufre una lesion menor y el mismo no considera que necesita tratamiento medico. Si la lesion del empleado resulta evidente, obtenda atencion medica y/o llame al On-Site Health & Safety or 911. Recuerde que también debe completare el “Formulario de Investigacion de Mishap/Near-Miss.

☐ Mu signature below confirms I AM NOT experiencing signs or symptoms resulting from this injury. Mi firma a continuación confirma que NO PRESENTO signos o síntomas debido a esta lesion.

☐ My signature below confirms I AM experiencing signs or symptoms resulting from this injury. These signs or Symptoms are: (Mi firma a continuación confirma que PRESENTO signos o síntomas debido a esta lecion. Dichos signos o síntomas son los Siguientes):

I hereby acknowledge my refusal or medical treatment and/or observation offered to me at the expense of BCCI for the injury described above. I understand signing this form does NOT necessarily affect my later eligibility of Worker’s Compensation.

I acknowledge my supervisor(s), in good faith, have offered and made available to me an opportunity to seek medical treatment and/or observation for this injury. I am aware my declination of medical treatment currently; results in no responsibility on my employer’s part for any medical expenses or lost wages relating to this injury.

I understand a Worker’s Compensation Claim Form (DWC-1) is available to me. However, since I am not seeking medical treatment and/or observation, and I do NOT have a desire to file a claim for Worker’s Compensation pertinent to the injury/illness described in this report, I have chosen NOT to accept and/or complete the claim form. I understand my rights regarding Worker’s Compensation and DO NOT wish to exercise them currently.

Later, I may request from my employer, via my supervisor, authorization to obtain medical treatment and/or observation for this injury. At that time, I understand Worker’s Compensation Claim Form (DWC-1) will be given to me. I understand per the Labor Code 5405 (a), where no benefits have been provided, I have a maximum period of one year from the date of injury to initiate a request for medical treatment and benefits.

Por el presente confirmo my rechazo del tratamiento y/u observación médica que me ofreció a su cargo BCCI por la lesión que sedescribe m s arriba. omprendo que firmar este formulario no afecta necesariamente mi elegibilidad posterior para Compensación al Trabajador.

Confirmo que mi(s) supervisor(es), de buena fe, me ofreció/me ofrecieron y puso/pusieron a mi disposición una oportunidad de recibir tratamiento y/u observación médica por esta lesión. Soy consciente de que mi rechazo del tratamiento médico en este momento no generaninguna responsabilidad a mi empleador por ningun gastos médico o salarios perdido relacionado con esta lesión.

Comprendo que se encuentra disponible para mí un Formulario de Reclamo de Compensación al Trabajador (DWC - 1). Sin embargo, debido a que no solicito tratamiento y/u observación médica y no deseo presentar un reclamo de Compensación al Trabajador pertinente a la lesión/enfermedad que se describe en este informe, decidí no aceptar y/o completar el formulario de reclamo. Comprendo mis derechos en lo que se refiere a Compensación al Trabajador y no deseo ejercerlos en esta oportunidad.

Mas adelante, es posible que solicite a mi empleador, por intermedio de mi supervisor, autorización para obtener tratamiento y/u observación médica por esta lesión. omprendo que en ese momento me entregar n un Formulario de Reclamo de Compensación al Trabajador (DWC -1). Comprendo que segun 5405(a) del Código de Trabajo, en los casos en los que no se proporcionaron beneficios, cuento con un plazo maximo de un a o desde la fecha de la lesión para presentar una solicitud de tratamiento médico y beneficios.

INJURED WORKER OR WITNESS STATEMENT

I _____ am submitting this written statement on _____.

To _____ of BCCI Construction, LLC. The submission of this statement is of my own free will and I have NOT been coerced or threatened in any manner of this submission of my statement.

IN YOUR OWN WORDS DECRIBED WHAT HAPPENED (Who, What, Where, When, & How)

Did you witness the Mishap? ☐ YES ☐ NO

What were you doing prior to the incident?

What were you doing after the mishap?

Signature:

Date:

Employer:

Employer Address & Telephone Number:

RECORDKEEPING

In Accordance with California Code of Regulations; *Title 8; Section § 14300-§14300.48*, we will maintain records of actions taken to implement, maintain, and sustain the Company's Injury Illness Prevention Program (IIPP). All records maintained will be on file for a minimum of 1 year.

Additionally, in accordance with California Code of Regulations (CCR), *Title 8, Section §3204*, Access to Employee Exposure and Medical Records, the records maintained by BCCI Construction, LLC in relation to the IIPP will not adversely affect the retention of the medical and exposure records. These records will also be maintained beyond the employee's service to the company.

The inspection records for any project or workplace will include:

- Individual performing the inspection.
- Date, Location, Type of Inspection.
- Findings and Category of Finding (e.g., Minor, Significant, or Critical).
- Recommendations to Correct Finding.
- Photographs of the Findings and Positive Program Management.
- Corrective Actions and Photographs of corrected Items.
- Unsafe Conditions, Practices, Procedures, and Processes.

These records will be maintained electronically in ProCore for the specific project or workplace and on the company shared drive for a minimum of 1 year.

The documentation (records) for all safety and health training for each employee will have the following information:

- Date, Time, Location of Training.
- Training Topic.
- Instructors.
- Name, Signature, and Division.

These maintained documents will be electronically stored on the company-shared drive and dates of training annotated on the company Microsoft Excel Training Matrix and Microsoft One Note, which the Director of Safety manages, updates, and maintains regularly. Any personnel who were employed for less than one year may request a copy of their training records. The terminated employee must sign the Letter of Acknowledgement, which states they have received their training records.

During the year, the Director of Safety is accountable for the completion of the OSHA 300 Log. Entries for the calendar year are annotated for every occurrence of a recordable injury or illness. If an entry cannot be annotated immediately, the Director of Safety must record the information within seven business days.

Senior Leadership will review and sign the Summary of the OSHA 300A log at the end of the year. Once the OSHA 300A is completed; this document will be properly posted at each area office from 01 February to 30 April as required by the OSHA Act and the same information will be reported electronically through virtual means.

33.0 PROJECT HEALTH AND SAFETY PLAN (HASP)

Once a project is awarded the Project Team works diligently to gather all information requested by the safety division as indicated below:

DOCUMENTS & INFORMATION REQUIRED (ALL PROJECTS)

- Scope of Work (e.g., Structures, TI, Demolition, Service, Healthcare, etc.).
- Building Rule and Regulations (If Applicable).
- Project Name, Number, and Start Date.
- Hazardous Survey & Soils Reports (e.g., ACM, Lead, Mold, VOC's, etc.).
- Building Contact Information is REQUIRED:
    - Building Security – Company Name and Telephone Number.
    - Property management – POC, Telephone Number, Company, e-Mail.
    - Chief Building Engineer – Name, Telephone Number, Company, e-Mail.
    - Client Representative – (e.g., CBRE, Cush & Wake, JLL, etc.).
- Trades Assigned to perform scope of work is REQUIRED):
    - Electrical, Mechanical, Plumbers.
    - Fire Sprinklers, Excavation, Demolition.
    - Safety Managers of Trades Contact Information is MANDATORY.

GOOGLE PROJECTS SPECIFIC REQUIREMENTS (MANDATORY):

In addition to the above information the following actions MUST be completed prior to mobilization of a Google Specific Project. BCCI Director of Safety is the Main POC on these requirements.

- ALL Trades MUST be enrolled in Highwire (aka Construct Secure).
- ALL Subs of Trades MUST enroll themselves in Highwire (Trade cannot do for them).
- Provide Director of Safety List of Trades for validation and verification of enrollment.
- Trades overall Scores will be evaluated during validation and verification:
    - Scores >80 (Green) and above NO further action is required.

- Scores between 70-80 (Yellow) a Corrective Action Plan (CAP) is Required and will be turned into the BCCI Director of Safety from Final Review and Approval.

- Scores <70 (Red) will require a Corrective Action Plan (CAP) and a meeting between Google Project Executive, Google EH&S, BCCI Senior Director Filed Operations, Studio Director, BCCI Director of Safety, and Trade will occur to discuss safety information.

- Google Project Executive and Google EH&S will render a decision after the meeting to inform if the trade may continue with scope of work on project.

- Provide a Listing of Google Facility Managers Contact Information (Name, Telephone Number, and e-Mail).

- Provide the following reports issued by Google EH&S (Environmental – Elevate) as to be inserted into the HASP:

    - Site Management Report (SMR).

    - Soils Management Plan (SMP).

    - Hazardous Survey Report (ACM, Lead, Mold, etc.).

- Project Team is required to procure the following QR Codes from LinkedField:

    - COVID-19 Daily Sign-In.

    - Safety Orientation and Safety 360°.

    - Hazard Reporting

- These QR Codes will also be sent to Safety Division one received.

34.0 HEARING CONSERVATION PROGRAM

PURPOSE

To determine employee exposure to noise, we use the following type of equipment: Uyigao UA-961 Sound Level Meter or similar equipment.

BCCI Construction, LLC notifies all personnel exposed at or above an 8-hour Time-Weighted Average (TWA) of 90dBA or above from the results of the monitoring by advising personnel verbally at the time of testing.

BCCI does provide an opportunity for the affected personnel or their representatives to observe any noise measurements performed on the jobsite. Controlling noise at the source utilizing engineering control methods will be considered first; prior to any other tactics are implemented. In addition, BCCI does select proper hearing protection devices for the affected employees according to the appropriate Noise Reduction Rating (NRR) of the device and the noise level exposure of the affected employee(s). Options of various hearing protection device will be given to the affected employee.

Methods of measuring the adequacy of Hearing Protection Attenuation are:

- Subtract 7 from the Noise Reduction Rating of the Hearing Protection Device
- Dive the above result by two (2) to arrive at a useful attenuation level

Monitoring is repeated whenever a change in work procedures, equipment, or controls increase noise exposures to the extent; either additional employees may be exposed at or above the TWA of 90dBA or the attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements of noise reduction.

HEARING PROTECTION:

BCCI Construction, LLC provides hearing protection to all personnel to an 8-hour TWA of 90 dB or greater and at NO cost to the employees. BCCI ensures the availability and use of Hearing Protection by all affected employees.

Employees have a variety of suitable protectors to attenuate (lower) the exposure at least to an 8-hour TWA of 90dBA. We perform evaluations of noise levels to assure the adequacy of the Hearing Protection attenuation for the specific noise environments in which the protection will be used and according to the specifications given in the appendix of the OSHA Standard. Re-evaluations for attenuation are accomplished whenever an employee noise exposure increases to the extent of current hearing protection no longer provides adequate attenuation and then provides more effective protection.

Any affected employee(s) are required to wear company-provided hearing protection and at NO time may the employee tamper with or modify the hearing protection equipment. Any damaged or defective equipment must be discarded and replaced immediately. Any affected personnel who fail to wear the provided hearing protection equipment will be subject to disciplinary action.

TRAINING AND INFORMATION:

BCCI Construction, LLC has an Occupational Noise Exposure Program for all personnel exposed to noise (onsite) at or above an 8-Hour TWA of 90dBA. Copies of the OSHA Standard are available to affected personnel or their representatives upon request.

Training is provided for all new personnel (e.g., field personnel) who may be exposed to high noise levels onsite or for current personnel if requested. We ensure all training material is readily available upon request and the material is up-to-date and consistent with any and all changes to the standard, protective equipment, or work processes.

All assurances are made to ensure each affected employee is informed of at the following information:

- The effects of noise on their hearing
- Purpose of Hearing Protection, the advantages, the disadvantages, attenuation types of protection, fitting, use, and care of these devices

BCCI has available informational materials relating to the Occupational Noise Exposure Standard which are supplied by OSHA.

Time to reach 100% noise dose	Exposure level per NIOSH REL	Exposure level per OSHA PEL
8 hours	85 dBA	90 dBA
4 hours	88 dBA	95 dBA
2 hours	91 dBA	100 dBA
1 hour	94 dBA	105 dBA
30 minutes	97 dBA	110 dBA
15 minutes	100 dBA	115 dBA

35.0 PANDEMIC PREPAREDNESS PLAN

OVERVIEW

A pandemic outbreak is a disaster which does not involve damage to physical property. Instead, the impact of a pandemic outbreak is focused on fatalities and high absentee rates. In an extreme situation, a pandemic outbreak could also involve the loss of critical services and create major long-term socioeconomic changes. This disaster-specific plan focuses on the additional planning needed to respond to a pandemic outbreak. This Pandemic Preparation and Response Plan for BCCI Construction, LLC assumes redundant communications, response teams, a command structure, etc. are part of the existing plan.

Typical planning focuses on site-specific or area-specific natural and manmade threats – earthquakes, fires, hurricanes, tornadoes, etc. Much of this planning is still applicable for pandemic outbreak planning. Additional planning needs to be made in the following areas:

- Social Distancing Policies.
- Personal Hygiene Policies.
- Personal Protective Equipment (PPE).
- Special Time-Off and Compensation Policies.

Social distancing policies, personal hygiene practices, and Personal Protective Equipment are designed to reduce the possibility of contracting a virus. Special time-off policies will be necessary for employees who either cannot work or who are not allowed to work for an extended time. For some businesses, special compensation policies will also be necessary for essential personnel who must work during an outbreak.

SCOPE

This plan is an organizational-level plan guiding emergency response of personnel and resources during a pandemic outbreak. Nothing in this plan shall be construed in a manner limiting the use of good judgment and common sense in matters not foreseen or covered by the elements of the plan. This plan is maintained by ERT & CMT Teams & Director of Safety. Additionally, all lessons learned from an event or exercise are evaluated, implemented, updated, and disseminated to all personnel within the company.

This plan shall be subordinate to Federal, State, County, or Local Health Departments, Plans, Health Orders during a pandemic declaration by any of these authorities. This plan is consistent with established practices relating to coordination of emergency response. The company will cooperate with the Office of Emergency Management, Police, Health, Fire, and other responders.

LIMITATIONS

This Pandemic Plan is designed to be a supporting plan component of the overall Business Continuity Management Program. Therefore, this Pandemic Plan by itself will not provide

adequate planning for other types of emergencies. In addition, this plan will be only partially effective under the following circumstances:

- The disaster causes an extreme loss for life.
- The disaster causes a complete breakdown of law and order.
- The disaster causes a breakdown of essential community infrastructure services.
- The disaster causes a complete regional breakdown of communication services.

PANDEMIC PLANNING AND RESPONSE TEAM

The Emergency Response Team (ERT) at each BCCI location, alongside the Crisis Management Team (CMT), and Director of Safety, will assemble to address the declared pandemic, epidemic, emergency, or disaster. Members of the ERT are from various divisions within Field Operations, Project Management, and Support Staff. Additionally, Superintendent(s) are also part of this vital team during the location of our projects in the field. Lastly, members of our Safety Committee are also participating in the ERT when the need arises.

PANDEMIC PLANNING AND RESPONSE TEAM MEMBERS:

Name **Title**	**CMT ROLE** **Responsibilities**	**Cell Phone**
Mike Scribner Chief Executive Officer	Chair	415.850.1418
	Ultimate crisis management decision authority Communicates with STOBG Management Chairs all Crisis Management Team meetings	
Cynthia Gage Senior Director Marketing	Corporate Communications	650.296.2469
	Direct Media Response. Community relations response Public Relations Communications Reviews and approves all corporate communications	
Rob Edington Chief Legal Officer	Chief Compliance Officer	415.225.2429
	Legal Compliance Direct legal response in Crisis Management situation Approves communication and polices	
Norma Adjmi Senior Director Human Resources	Employee Relations	650.773.3634
	Employee communication and updates Direct Human Resources response during Crisis Management situation Assures compliance and oversight regarding labor laws	
Armond Balaian Division Vice President	Silicon Valley Office Lead	415.559.0274
	SV Employee communications SV Resource coordination and management	
Dominic Sarica President / Chief Operating Officer	Deputy Chair/San Francisco Office Lead	415.420.9393
	Communicates with STOBG Management Co-chairs all Crisis Management Team meetings	
	Corporate compliance	
Eric Bauer Senior Director Field Operations San Francisco	Field Operations, Field Communications Emergency Response Team	415.850.0052
	Communication to and from field teams Implement field strategies from Crisis Management Team Responds as member of Emergency Response Team	

Jim Williamson Field Operations Manager Structures Division	Field Operations Emergency Response Team	415.321.9114
	Communication to and from field teams Implement strategies from Crisis Management Team Responds as member of Emergency Response Team Safety implementation and strategy	
Matty Kernen Director of Safety	Safety, State, and local regulations, STOBG Communications	415.264.3840
	Interpret safety regulations Responds as member of Emergency Response Team STOBG communication	
John Kranz Chief Strategy Officer	SoCal Regional Chair/LA Office Lead	415.265.2180
	Client Communications	
Ken Chua Senior Director Information Technology	IT and Systems	415.939.4797
	Ensure internal and external communications systems are operational IT and systems recovery	
Mallory Wall Vice President Global Services	Local Client Communications	415.850.1416
	Client communications	
Sean Hansen Senior Director of Field Operations Silicon Valley	Field Operations, Field Communications Emergency Response Team	415.850.1427
	Communication to and from field teams Implement field strategies from Crisis Management Team Responds as member of Emergency Response Team	
Todd Steinert Chief Financial Officer	Financial	949.466.6493
	Payroll, cash flow, bill payment and accounts payable	
Wendy Peterson Division Vice President San Francisco	Project Management Communications Client Communication	415.850.1358
	Communication to and from project management teams Implement project management strategies from Crisis Management Team	
Greg Dunkle Chief Administrative Officer	STOBG Representative	212.251.9220
	Receives Information/Primary Point of Contact during a disruptive event	
Nicholas Brown Director of Field Operations Southern California	Field Operations, Field Communications Emergency Response Team	213.334.5700
	Communication to and from field teams Implement field strategies from Crisis Management Team Responds as member of Emergency Response Team	
Brian Hall Director Southern California	Field Operations, Field Communications Emergency Response Team	213.514.0748
	Communication to and from field teams Implement field strategies from Crisis Management Team Responds as member of Emergency Response Team	

ESSENTIAL SERVICES

Business Unit	***Essential Services***	***Staff Assignments***
Communications	Internal and External Communications	IT Dept Director of Safety
Facilities	Building Maintenance Essential Utility Service Protection of Perishables Environmental Controls	Property Management, Local Utilities Services, Industrial Hygienist – Senior Leaders, Director of Safety, Superintendents, and Office Managers
Finance & Accounting	Emergency Purchase Alerts Payroll Processing Revenue Collection	Chief Financial Officer and Financial Support Staff
Human Resources	Special Time-Off Policies Special Compensation Employee Contact Workforce Assessment Employee Health Care Benefits	Initial Directives from Federal and State Departments, Remainder of Services are to be managed by Human Resources Division
Information Technology	Communications Infrastructure & Critical Applications	IT Department
Operations Group	Maintaining Mission-Critical Production & Services at minimum acceptable levels	Senior Director Field Operations, Director Field Operations, Director of Safety, Field Operations Managers, Superintendents, and Labor Foreman
Business Development & Marketing	Client, Customer, and Prospect Contacts	Chief Strategy Officer Senior Director Marketing
Security	Emergency Communications Access Control	Office Manager at Office Locations, Superintendents, Project Managers at project sites & Director of Safety

COMPANY PRIORITIES

Priority	***User Group(s)***	***Infrastructure Support Requirements***	***Supported from at Home or Remote?***
Mission Critical – Communication Operations Personnel Safety	 All Personnel Field Operations Human Resources Safety Division	 Computers / Electronics Computers / Radios Telephonic / e-Mail / Video PPE / Supplies / Protocols	 Home / Remote Onsite Home / Remote Home / Remote / Onsite
Critical (can be Temporarily Suspended Operations (Site)	Field Operations	Radios / Cellular Phones	Onsite / Remote
Important - Personnel Health and Safety Purchases Benefits Security	 All Personnel All Personnel Financial Management Human Resources Crisis Management	 Telephonic / Video / e-Mail PPE / Supplies / Radios PO's / Line of Credit Access to Platforms Communications	 Home / Remote / Onsite Onsite / Remote Home / Remote Home / Remote Remote / Onsite

EVALUATION OF RISK

Exposure	Staff Assignments	Risk Level		
		Low	Med	High
Are the company & project sites located in an urban environment?	CMT / Field Operations			
Do employees use mass transportation?	CMT / Field Operations			
Does the company share the facility with other businesses?	CMT / Field Operations / Security			
Can the company suspend receiving all guests and visitors?	CMT / Office Manager			
Can the company suspend all travel?	Crisis Management Team			
Can employees work from home?	Crisis Management Team			
Does the company have multiple locations where minimum levels of mission-critical production and services can be maintained in non-affected areas?	CMT / Field Operations			
Can the company and project sites function if all employees, guests, and visitors are required to wear personal protective equipment?	CMT / Field Operations / Director of Safety			
Does the medical plan cover flu shots?	Human Resources			
Does the company and project sites have on-site sanitizing equipment?	Field Operations, Office Manager, Director of Safety			
Does the company and project sites have on-site medical supplies such as gloves, masks, etc.?	Field Operations, Senior Leadership, & Director of Safety			

TASK ASSIGNMENTS AND PLANNING STATUS

Task	Staff Assignments/ Responsibility	Status		
		Not Started	In Progress	Complete
Identify a group to monitor the situation	Crisis Management & Emergency Response Team			
Develop plans to maintain mission-critical operations: Plans to function with a skeleton workforce of essential personnel Back-up plans to maintain critical communication and technology services	Crisis Management & Emergency Response Team Crisis Management Team & Human Resources Information Technology & Crisis Management Team			
Develop plans for employees to work from home*, and consider the following: Do employees have desktop or laptop computers at home? Can employees access files and applications over the internet? Is high-speed internet access required? Can employees be supplied laptop computers with air cards? Can employees work independently rather than in groups? Can conference calls replace the need for group meetings? Do employees require access to hard copy files?	Crisis Management Team Information Technology Information Technology Information Technology Information Technology Crisis Management Team Crisis Management Team & Information Technology Information Technology			

Task	Staff Assignments/ Responsibility	Status		
		Not Started	In Progress	Complete
Collaborate with: Health plan insurers & Public health agencies	Human Resources			
Store Personal Protection Supplies & Products	Human Resources & Information Technology			
Develop liberal time-off policies for: Personal illness, Family illness, Community quarantines, School closures, Transportation closures	Crisis Management Team, Human Resources			
Establish return-to-work policies	Crisis Management Team & Human Resources			
Establish special compensation policies: Essential employees who must work, Employee sick leave	Human Resources & Financial Management			
Track vaccination programs	Human Resources			
Assist employees with access to vaccination program	Human Resources			
Educate employees on hygiene habits and work policies	Director of Safety			
Require employees practice good hygiene habits	Crisis Management Team & Director of Safety			
Place Wash Hands & other hygiene messages in bathrooms &in other areas	Field Operations, Office Manager, Director of Safety			
Normal Operations with Reduced Staff	Crisis Management Team & Field Operations			
Protection of Environmentally Sensitive Areas	Crisis Management Team, Field Operations, Director of Safety			

SOCIAL DISTANING STRATEGIES

Strategy	Staff Assignments/ Responsibility	Strategy Effectiveness		
		Ineffective	Partly Effective	Effective
Can administrative support employees work from home?	Crisis Management Team & Human Resources			
Can operational group employees work from home?	Crisis Management Team & Human Resources			
Can administrative support employees work remote locations?	Crisis Management Team & Human Resources			
Can operational group employees work from remote locations?	Crisis Management Team & Human Resources			
Can we deny access to visitors and guests?	Crisis Management Team & Office Manager			
Regarding Information Technology services: Can employees work from alternate sites for extended periods of time? Will alternate sites be available? Will travel to alternate sites be possible?	 Crisis Management Team & Human Resources Crisis Management Team & Human Resources Crisis Management Team			
Can everyone function while wearing personal protective equipment – face masks, eye goggles and perhaps other protective equipment? Administrative support employees Operational group employees Visitors and guests	Crisis Management Team & Safety Division			

Strategy	Staff Assignments/ Responsibility	Strategy Effectiveness		
		Ineffective	Partly Effective	Effective
Can face-to-face contact be eliminated? Admin & Ops Group employees Visitors and guests	Crisis Management Team Field Operations Safety Division			
Can face-to-face talking be eliminated? Admin & Ops Grp employees Visitors and guests	Crisis Management Team Field Operations Safety Division			
Can all social gatherings/events be cancelled?	Crisis Management Team			
Can meetings, shared offices, handshaking, etc. be eliminated?	Crisis Management Team Safety Division			
Can employees eat lunch alone at their workstations?	Crisis Management Team Safety Division			
Handwashing & Sanitizing Stations? Admin & Ops Grp employees	Safety Division, Office Management			
Travel and business access restriction policies: Deny access to anyone who has traveled to an infected area Deny access to guests and visitors Eliminate travel to infected areas Eliminate all travel	Crisis Management Team Human Resources Field Operations Safety Division			

SPECIAL POLICIES FOR INFECTED PERSONNEL

IF ANY PERSONNEL EXHIBIT SYMPTOMS

- If at work, the employee should be sent home or, if available, to a medical facility, wearing a facial covering.
- If at home, remain at home and contact Safety Division and Human Resources.

NOTE: Symptoms vary during a pandemic; however, an example could be fever, headache, bodily aches and pains, fatigue, sore throat, vomiting, nausea, etc. then identify path of travel, interaction with personnel, date of onset, potential testing, and cleaning or disinfecting as prescribed / located.

- Maintain contact with personnel who remain at home.
    - Telephonic Contact or e-Mail.
    - Avoid Personal Contract

ACTION LEVELS

Fundamentally, the response to a pandemic outbreak can be broadly classified as follows:

- Level 1 – Monitor and Preparation.
- Level 2 – Implement Social Distancing and PPE Policies and maintain Operations.
- Level 3 – Close facility and work from home or other safe remote location

KEY FACTORS

The primary factors involved in determining a course of action are the 'severity' of the outbreak, the availability of an 'effective vaccine' and the 'location(s)' of the outbreak. The severity of the outbreak is determined by the 'contagiousness' and 'mortality rate' associated with the virus. The location can be sub-classified as either 'overseas', within 'North America' or within the 'immediate area'.

OUTBREAK SCENARIO

Let's assume a contagious/airborne strain does develop (many experts would argue that this is a matter of "when" rather than a matter of "if"). Let's also assume an effective vaccine will not be available for several months (medical experts indicate that with current technologies this is the likely scenario). The critical factors now become the mortality rate associated with the virus and the location(s) of the outbreak.

The mortality rate will be the primary factor in determining what actions (Level 2 or Level 3) will be taken. The location(s) of the outbreak will be the primary factor in determining when the actions are taken.

RESPONSE

If the mortality rate is not too high, the business should consider executing Level 2 actions – remaining open and implementing social distancing plus personal protection equipment policies as needed. If the outbreak is not in the immediate area there may be some time to develop an effective vaccine before the virus reaches the immediate area.

Depending on the location(s) of the outbreak, social distancing policies would likely be gradually introduced. If the outbreak is not in the immediate area, certain travel and visitor restrictions would likely be effective immediately. If the outbreak is in the immediate area, full social distancing and personal protection equipment policies would become effective.

If the mortality rate is high, the business should consider executing Level 3 actions – closing the business facility and work from home or other safe remote locations. A contingency of essential personnel may also have to remain on site provide security and, if applicable, to maintain environmental controls for sensitive materials.

MORALITY RATE

What is a high mortality rate? There appears to be no clear-cut universal answer to this question. Although this was not the case with the 1918 Spanish Flu, mortality rates may be concentrated on the very old and the very young – not directly impacting the business significantly. Also note that closing the business does not guarantee everyone's safety. Each business will need to address this question individually.

NOTE: If the morality rate does not exceed 1 or 2%, the recommendation is for the business to remain open.

PLAN ACTIVATION

Activate the plan when a contagious outbreak occurs overseas. If a contagious outbreak occurs within North America, then an immediate activation of Plan Execution (Section VI) steps should be taken.

- Activate Senior Leaders Emergency Response Team:
    - Closely monitor the location(s) and mortality rate of the outbreak.
    - Closely monitor absenteeism rates.
    - Meetings scheduled at a predetermined time.
    - Meetings conducted over Microsoft Teams.
    - Safety Division on-call 24 / 7
- Track Vaccination Program (If required).
- Implement Travel Restrictions to infected areas.
- Complete all pre-event preparation steps.

PLAN EXECUTION

Initial Activation - Initial actions are taken when a contagious outbreak occurs within North America. If the contagious outbreak does not appear to be contained or if there is a chance the outbreak will spread to the immediate area, then full activation should be taken.

- Activate Senior Leaders Emergency Response Team
    - Closely monitor the location(s) and mortality rate of the outbreak.
    - Closely monitor absenteeism rates.
    - Meetings scheduled at a predetermined time.
    - Meetings conducted over Microsoft Teams.
    - Safety Division on-call 24 / 7.
- Track Vaccination Program (If required).
- Implement Travel and Business Facility Access Restriction Policies.
- Restrict Travel to any Affected Areas.
- Complete all pre-event preparation steps.

- No Access Allowed to anyone who has traveled.
- If possible, DO NOT Allow Guests or Visitors.
- If possible, Allow Employees to work from at home or remote.
- Consideration to activation of alternate sites (if applicable).
- Consideration from working at alternate sites (if applicable).
- Limit Face-to-Face Contact (if possible).
- Avoid in-person meetings, shared offices, handshaking, etc.
- Cancel any social gatherings or events.
- Allow personnel to eat lunch alone at workstations.
- Shift work (if applicable) shall leave an interval of inactivity.
- Any personnel with symptoms:
    - Remain at home, send home, or medical facility, with Facial Covering.
    - If at home, remain there and not report to work.
- Maintain contact with personnel who are at home
    - Telephonic, website, or e-Mail.
    - Avoid personal contact.

INITIAL STEPS

- Require personnel to wear face masks, safety glasses, and other PPE.
- Place Handwashing or Sanitizing Stations throughout entrances, offices, and project sites.
- Ensure all PPE, Hand Sanitizer, Cleaners, Towelettes, etc. available to personnel.
- Suspend in-person meeting.
- Maintain employee, client, trades, customer contact.
    - Telephonic, Website, and e-Mail.
    - Avoid Personal Contact.

Facility & Jobsite Closure –

- Maintain Mission-Critical & Service Capabilities:
    - Work from Home.
    - Work from other Safe Business Location.
    - Work from Vendor Sponsored Alternate Sites.
- Employees working together, implement all precautions in Section Q1

RECOVERY

Once the immediate danger has passed, either large numbers of individuals have contracted the virus, survived, and now effectively immune, or an effective vaccine has been developed and readily available. We now enter the recovery phase of the pandemic.

Emergency Response Team and Crisis Management Response Team:

- Maintain a regular meeting schedule.
- Direct business Resources.
- Develop and Execute Recovery and Timeframe.
- Continue to Monitor Future Threats from Newly Mutated Strains.

Executive Management

- Provide Leadership.
- Provide Resource Direction.
- Involved in with Accountability (Dead, Injured, or Missing).

Communications

- Maintain Regular Meetings of the Crisis Communication Team.
- Coordinate all Communication.
- Develop Messages for Media, Employees, and Others.
- Direct HR to Update any Emergency Hotlines.
- Update Webpage Message (Marketing).
- Direct IT to Update Webpage Message.

- Maintain Contact with Media (Marketing).

Facilities

- Maintain a Safe Environment.
- Maintain Environmental Controls.
- Account and Secure any Hazardous Materials.
- Complete Cleaning and Disinfection Activities of all frequently touched surfaces.
- Cleaning shall be performed at minimum 4 times throughout the shift.
- Cleaning will also occur after a potential infection was discovered during the shift.
- Provide Food, Water, and Logistical Supplies to ERTs and Sites

Finance & Accounting

- Maintain Procedures and Rapidly Approve Purchasing Requests.
- Maintain Payroll Operation.
- Maintain Bank and collection procedures.
- Risk Management – File Insurance Claims (if applicable).

Human Resources

- Contact all Employees and Access Workforce Capabilities.
- Maintain Emergency Hotline for Employees.
- Maintain Critical Employee Benefit Services.
- Maintain Proper Employee Hiring and Termination Procedures.

Information Technology

- Shift Critical Operations from IT Recovery Site back to Main Data Center.
- Maintain Emergency Webpage.
- Maintain Communication Infrastructure.

Operations Group

- Maintain Mission Critical Service.

- Maintain Project Site Locations.
- Contact Field Personnel for Accountability.
- Re-Establish Normal Operations.
- Re-Open & Inspect provide Damage Assessment.
- Ensure safe environment for trades and personnel to return.

Business Development & Marketing

- Maintain Client, Customer, and Prospect Contact.
- Check-In with Clients and Property Management

Security

- Work with Property Security and ensure security is provided.
- Maintain communication.
- Safe-Off Dangerous Areas.
- Provide and Maintain Access Control.

PLAN MAINTENANCE

This Plan requires maintenance by the Safety Division who is responsible for plan updates. Plan maintenance is either scheduled or unscheduled. Scheduled maintenance is time-driven; unscheduled maintenance is event-driven.

Scheduled maintenance consists of quarterly reviews and updates as well as annual structured walk throughs and/or tactical exercises. Unscheduled maintenance cannot be anticipated such as when there is an acquisition or merger, transfers, promotions, personal relocation (e.g., home telephone number change), or personnel changes such as resignations of individuals on the Emergency Notification List.

EMERGENCY AND CRISIS MANAGEMENT RESPONSE TEAMS

The Emergency and Crisis Management Response Teams will assemble and set up an Emergency Operations Center (EOC) and this location may be in-person or via technology. This assembly is to execute this plan. Dependent on the circumstances, the EOC should contain Emergency Supplies (e.g., food, water, tools, emergency equipment, etc.) and should ideally be fortified (e.g., reinforced walls, generator, etc.).

Location:

Following a Disaster, Epidemic, or Pandemic the EOC will be established at the closest undestroyed location or through technological means:

The Primary EOC is Located at:
San Francisco – 1160 Battery Street, Suite 250, San Francisco, San Francisco County, CA
Silicon Valley – 150 East Dana Street, Mountain View, Santa Clara County, CA
Los Angeles – 515 South Flower Street, L19, Los Angeles, Los Angeles County, CA

If the Primary Location is in accessible an Alternate Location will be determined:

Secondary EOC Location is Located at:
Courtyard Marriott – 5059 Hopyard Road, Pleasanton, Alameda County, CA
Embassy Suites – 1345 Treat Boulevard, Contra Costa County, CA
San Ramon Marriott – 2600 Bishop Drive, San Ramon, Contra Costa County, CA
BCCI Office – 21084 Bake Parkway, Lake Forest, Orange County, CA

If both the Primary& Alternate Location are inaccessible Technological Means & Methods are:

Technological Means and Methods will be:
Blue Jeans Video Conferencing – www.bluejeans.com 800.403.9256
Microsoft Teams Online Meetings – www.microsoft.com/microsoft-teams
Verizon Wireless – 800.262.1999
AT&T – 844.971.2832

Personnel:

Emergency & Crisis Management Response Teams, along with Company Incident Commander, Chief Legal Officer, and Director of Safety MUST attend. Alternate ERT & CMRT members shall attend when the Primary Team Members are unable or unavailable to attend.