



SAFETY POLICIES FOR SUBCONTRACTORS for ROBERT W. CARLSTROM CO. INC.

July 31, 2018

INTRODUCTION

We at Robert W. Carlstrom Co. Inc. take today's safety issues very seriously. We currently use the services of a contracted quality manager, Bob Umhoefer, who conducts weekly job site audits regarding safety issues with his main concern being the safety, health and well-being of all on the project site. During the weekly audits, he will not only be evaluating RWC's safety performance, but that of all subcontractors' workers on the job site as well.

Following are the safety requirements for ALL workers on a jobsite - RWC employees and the Subcontractors' employees:

A. PRECONSTRUCTION MEETING

All subcontractors shall have their site supervisors and designated project safety representative attend the pre-construction meeting. Attendance at the meeting will be documented. The purpose of this meeting is to review and agree to the following:

- Safety Procedures for the project
- Safety orientation methodology for each contractor
- Record keeping procedures for inspections and violations
- Accident reporting and emergency procedures
- Sanitation and water supply procedures

B. SAFETY SUBMITTALS

Pre-Construction Phase: Subcontractors shall have on-site the following information for RWC review prior to the start of construction activities:

- Subcontractor's Written Safety Program
- MN AWAIR Program
- SDS Sheets of all chemicals to be brought on site
- List of Subcontractor's personnel trained in CPR/First Aid
- Designation of Subcontractor's Project Safety Representative

Construction Phase: Subcontractors are required to have available for RWC review the following information during the construction phase of the project:

- Weekly Safety Meeting minutes
- Employee orientation documentation for new employees
- Weekly jobsite safety inspection audits
- Accident, Injury, and Incident reports

C. PROJECT SAFETY

Subcontractors will comply at a minimum with OSHA 1926 Construction Standards unless more stringent state or local standards exist. Other requirements include:

- Maintain a first aid kit on site
- Maintain safety protection systems (guardrails, back up alarms, etc)
- Prohibit the use of alcohol or drugs on the jobsite
- Maintain good housekeeping at all times
- Inspect equipment and tools daily

D. PERSONAL PROTECTIVE EQUIPMENT

Hard hats and safety glasses are mandatory on all RWC jobsites, along with any other personal protection equipment required for doing any job safely. The contracted Quality Manager and all Job Superintendents will have complete authority to intervene in any act or job task being performed that they feel is unsafe and could result in bodily injury, as per *The General Duty Clause 5 (a)(1)*. They may ask a worker to leave the job site until proof of proper training is obtained. Please inform your employees of this fact and to comply with safety requirements. Despite the posted signs, some subcontractors' employees still need reminding repeatedly to wear their hard hats or safety glasses. We are not implying that all subcontractors' employees need to be reminded. There are some who are doing a very good job of following the safety standards and we appreciate that. We feel that after three reminders to the same person, it is a reflection on how well we are enforcing our safety program. If constant reminders are necessary, the worker may be asked to leave the job site.

- 100% Hard Hat policy
- 100% High Visibility Garment policy (See Earthmoving Standard)
- 100% Eye Protection with side shields
- Hearing Protection as needed
- Leather Boots
- Proper work clothing including long pants and shirts with at least 4" sleeves
- Fall protection equipment as required by OSHA regulations

E. HAZARDOUS MATERIALS PROCEDURES

- Properly label all containers
- Provide SDS sheets for all hazardous materials
- Store hazardous materials in accordance with SDS
- Train employees in proper handling of hazardous materials
- Dispose of hazardous materials in accordance with applicable regulations

F. MN RULE 5207.1000 OPERATIONS OF MOBILE EARTHMOVING EQUIPMENT

All workers on site are to be trained on and be aware of the hazards of working around mobile earthmoving equipment. A copy of the RWC Mobile Earthmoving Equipment policy will be available to all employees working on site. Initial training will be provided to all supervisors working on site and it is their responsibility to communicate this policy to their workers. At a minimum, the following procedures must be taken:

- All workers shall be aware of the hand signals and procedures for approaching a piece of heavy equipment.
- All workers working around heavy equipment shall wear a high visibility garment (vest with reflective striping)
- All workers and visitors to the site shall check in with the RWC supervisor immediately upon coming onto the site for the first time.

G. COMPETENT PERSONS REQUIREMENTS

- Subcontractor shall comply with the specific “competent person” requirements of OSHA.
- Upon request, Subcontractor shall provide the credentials of any individual designated as “competent person” in response to OSHA requirements.
- Only authorized persons shall operate an aerial lift. (CFR 1926.453(b)(2)(ii))
- The employer shall certify that each forklift operator has been trained and evaluated as required by OSHA (CFR 1910.178(l)(6)). The certification shall include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training or evaluation.

H. ENFORCEMENT OF SAFE WORK PRACTICES

RWC will enforce a ZERO TOLERANCE POLICY for subcontractors that do not comply with the policies set forth under the Subcontractor’s Safety Requirements or the safety rules and regulations of OSHA 1926 Construction Standards or state governing body. Any worker found not following these policies will be asked to leave the jobsite and not return until he or she is willing to correct all violations and remain in compliance with policies including utilization of required protective equipment. Any exceptions to these policies are to be cleared by the RWC Job Superintendent and the Contracted Quality Manager in writing, at the pre-construction meeting, on an individual job basis. To avoid any down time and not interrupt schedules, please inform your employees of these policies.

Again, the safety, health and well-being of EVERYONE on all RWC job sites are our main concerns. We want everyone to go home at the end of the work day healthy and injury free.

Sincerely,

Scott Umhoefer
President