Project Safety Plan

Safety Policy Mission Statement

Gallant Builders is fully committed to the objective of accident prevention by providing safe workplaces for all employees, its property, third parties and their property and other persons who may be affected by its activities and its responsibility to protect the environment.

Our Project Managers, Superintendents, and the other site managers are responsible to safely and effectively build each project in accordance with the applicable laws and regulations and to provide our employees and the employees of our trade contractors with a safe, healthy, and drug free work environment. The only acceptable number of injuries or accidents is zero, and zero is always our goal.

Gallant Builders views safety as a core value and will not sacrifice the safety of people for production or monetary gains.

Likewise, each subcontractor, supplier, and their tier subcontractors (generally "subcontractors") have the duty to initiate and maintain a safety program that provides their workers with a safe and healthy work environment. All subcontractors on our work sites and elsewhere in the performance of their work must comply with the safety and health regulations established by the Gallant Builders, OSHA, state OSH programs, manufactures rules for use of tools and equipment as well as any site-specific programs that may be contractually required. Subcontractor safety programs should include, but not be limited to, hazard recognition, safety meetings, JHA's, proper use of tools and equipment, hazard communications, frequent inspections, accident investigation, and other aspects discussed in this document. Subcontractors with lower tiers of subcontractors have the total responsibility to see that their lower tiers also comply with the subcontractor's requirements.

Clear communication and planning among Gallant Builders and the subcontractors is critical to achieve our mission. Subcontractors are required to communicate their work schedules to Gallant Builders in advance of any work so that Gallant Builders and necessary Owner representatives are generally aware of the location and nature of the work and the loss prevention measures that are being implemented, particularly if the work is to take place outside of fenced, controlled work site. Gallant Builders also requires that subcontractors keep them fully aware of any work or task that is to be done outside the normal working hours of the project.

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Derik Lundy, Partner
Gallant Builders

I. Responsibilities and Lines of Authority

Statement of Employer's Responsibility for Implementation of Plan

The Zero Harm Philosophy is a fundamental belief of Gallant Builders and a shared responsibility of all project employees regardless of position or job description. Gallant, through written policies and procedures, implementation of the Site-Specific Safety Plan process, employee training and orientation, pre-employment Drug and Alcohol Testing program, will make every attempt to ensure the continued health and safety of its employees. Each employee of the project must accept responsibility for their own behaviors and personal safety and for the safety of others around them by working safely and insisting that others do the same.

Every project employee is empowered by the Safety Program to:

1. Conduct their work and behavior in a safe manner.
2. Stop work immediately to correct any unsafe condition.
3. Take corrective action so that work may proceed in a safe manner.

Subcontractors and Suppliers

Subcontractors shall have and implement a written Safety & Health Program for this Project that meets or exceeds the provisions contained in the Gallant Project Safety Program in addition to complying with all Federal, State and Local codes, laws, regulations and contracts. Subcontractors must also address the project specific aspects of their contract as they relate to safety, health and the environment.

Safety Pre-Construction Meeting

The Subcontractor's on-site Supervisor and the Subcontractor's Designated On-site Safety Representative must schedule and attend a Pre-Construction Safety Meeting with the Project Superintendent to discuss the Subcontractor Safety Requirements. The Pre-Construction Safety Meeting should take place at least five (5) working days before startup to allow for review of required documentation.

The Pre-Construction Safety Meetings will include as a minimum, a review of the safety section(s) of the contract, the Gallant Builders Subcontractor Safety Package Requirements including Job Hazard Analyses and other safety submittals, and applicable Subcontractor specific safety programs.

Subcontractor Safety Package

The "Subcontractor Safety Requirement contains an overview of the general Gallant Project Safety Plan and may include trade specific requirements. It is prepared as a convenience for Subcontractors, but is not a substitute for a Subcontractor's Safety & Health Program, which must meet or exceed the requirements of the Gallant Project Safety Plan, the contract documents and Federal, State, Local or other applicable regulations.

Subcontractor's Lower Tier Subs, Vendors and Suppliers

Subcontractors are responsible for their lower tier contractors, suppliers and vendors with regards to safety, health and security requirements.

Subcontractors who in turn contract out parts of their work, have the total responsibility to see that their lower tier contractors comply with project safety requirements. Additionally, the Company's Project Manager and/or the Company's Project Safety Representative shall be notified that the lower tier contractors are arriving at least five (5) days before work starts. The Subcontractor will be held directly accountable for all lower tier contractors.

Subcontractor Oversight

Gallant Builders is committed to establishing and maintaining a safe and healthy environment for all Project personnel, its customers and members of the general public affected by our construction projects.
Gallant is actively involved in the oversight of our Subcontractor's from an environmental, health and safety perspective. Our Safety Director is involved from the beginning with Project Supervision to oversee the Risk Assessment process to identify the Safety, Health and Environmental, (S, H&E) aspects/hazards associated with the Project.

The Gallant Safety Department along with Project Management use the following to evaluate the Project Safety, Health and Environmental, (S,H&E) risks:

1. **Risk Assessments** – These identify the Safety, Health and Environmental aspects/hazards associated with the Project. Risk Assessments uses specific guidance to identify the nature of the hazards and require site input to identify the specific hazards. The Risk Assessment also uses specific guidance to identify the nature of the controls in place and require site input to control/mitigate the hazards.
2. **Pre-Construction Meetings** – Each subcontractor is required to attend a Pre-Construction Meeting in which Environmental, Health and Safety items are discussed with the subcontractor, Gallant Project Management and the Safety Director. The Pre-Construction Safety Meetings will include as a minimum, a review of the safety section(s) of the contract, the Gallant Subcontractor Safety Package Requirements including activity specific Job Hazard Analyses and other safety submittals, and applicable Subcontractor specific safety programs.
3. **Site Specific Safety Programs** – Subcontractors submit their safety program to Gallant along with Site Specific Safety Plans to address specific hazards (i.e. Fall Protection)
4. **Job Hazard Analysis (JHA's)** – Subcontractors are required to submit their daily JHA's to Gallant for review and comment. The JHA's are then used by the subcontractor as a planning tool.
5. **Project Safety Meetings - Weekly Tool Box Talks**
   Project employees attend a Weekly "Tool Box Talk" Safety Meeting and sign an attendance sheet which is kept in the on-site Safety File. Tool Box Talk Safety Meeting Topics are distributed by the Superintendent or the Loss Prevention Department and are made available for use by Subcontractors.
6. **Weekly Project Safety/Progress Meeting**
   Part of every Project Safety/Progress Meeting addresses safety related issues including Safety Audit Reports, recent incidents and injuries, and planning for safety aspects of future activities. Issues discussed are documented as part of the Safety/Progress Meeting Minutes.

GENERAL REQUIREMENTS FOR ACCIDENT PREVENTION

New Project Staff Orientation

The Project Safety Plan and other pertinent Safety issues will be reviewed and discussed in the Safety Section of a "New Project Staff Orientation" held as scheduled by the Project Manager prior to the start of construction for the Project.

Pre-construction Survey

A Pre-construction Survey of non-restricted areas/items including photos and/or video and a report of findings will be completed to identify and document the conditions of on and off site property, structures and other loss risk considerations.

Signs and Postings
Federal, State, Local, Gallant Builders and Contract required Signs & Postings including the "Emergency Phone Numbers and Procedures" and "Emergency Action Site Plan" will be displayed in the Project Office, the Project Display Case and/or other appropriate locations.

Visitors
All visitors to the site must first obtain permission from an authorized Gallant Builders representative, sign a Visitor's Release Form and obtain and wear a hard hat and safety glasses and work boots.

Shared Equipment/Safety Devices
Subcontractors will complete an Equipment Use Release Form before using any Gallant Builders owned, rented or installed equipment or safety devices. The form can be obtained from the Safety Director.

Radios
Communication radios only. **No music radios or other personal music devices** are permitted.

Cell Phones and Texting
Cell phone use while operating vehicles or equipment is prohibited. The use of “ear buds” / ear phones is also prohibited during work activities. Personal phone calls and texting are restricted to breaks and emergencies.

Drug Policy Statement
Gallant Builders reserves the right to test anyone working on our projects for alcohol or drugs and reserves the right to remove any contractor or employee found in violation of any safety rules or policies.

Subcontractors and others performing work on a Gallant Builders construction site must have a Substance Abuse Program that is substantially similar to the Gallant Builders “Drug, Alcohol and other Prohibited Items Program,” which has been provided to the Subcontractor. The Subcontractors must supply verification to the authorized Gallant Builders representative indicating they can and will comply with these requirements.

A “Substantially similar” program would be a program that contains, at a minimum:

1) Pre-employment testing
2) Random testing
3) Post-accident / incident testing
4) Testing upon suspicion

TRAINING

New Hire Indoctrination and Safety Training

Every “new-to-site” employee will attend a lecture and/or video "Safety & Health Orientation and Basic Training" (English & Spanish) Attendance at this meeting will be documented.

A hard hat sticker will be issued to employees indicating completion of the Orientation and Basic Safety Training.

All newly placed full-time, temporary employees and subcontractor's employees with less than six months' experience in the assigned job will be considered a Short Service Employee and will be will be subject to the policies and procedures in the Gallant Short Service Employee Program.

Project Specific Items

In addition to the general orientation and basic safety training, specific project safety topics will also be covered. Those topics will typically include, but not be limited to the following as applicable:

- Hard Hat Sticker
- Speed Limits
- Parking
- Photography Restrictions
- Restricted Access Areas and Buildings
- Emergency Action Plan
- Emergency Procedures and Accident Reporting
- Severe Weather Procedures
- 100% Mandatory GFCI Protection
- 100% Fall Protection - 6' Rule
- 100% Eye Protection
- Job Hazard Analysis (JHA)
- Noise Protection
- Environmental Protection
- Permit to work system (hot work, excavationand trenching, electrical room access, etc)
- Hazardous Wastes
- Non-Hazardous Waste Management
- Spill Procedures

MANDATORY / CERTIFIED TRAINING

Mandatory and/or certified training is required for certain activities including those related to, but not limited to the following:

- Hazard Communication (HazCom)
- Stair & Ladder use
- Scaffolding - erection, dismantling and use
- Fall Protection
- Personal Protective Equipment selection and use
- Excavation
- Crane Operation
- Forklift Operation
- Powder Actuated Tool Operation
- Confined Space Entry

Supervisor and Employee Periodic Safety / Health Training

Gallant Builders Project Staff, Supervisors and Safety personnel will complete an OSHA 30 Hour Course for Construction Industry Safety & Health conducted by / at the direction of the Gallant Safety Director.

Hourly employees will attend a Weekly "Tool Box Talk" Safety Meeting conducted by their Supervisor and sign an attendance sheet which is kept in the on-site Safety File. Training materials are available for use by Subcontractors.

SUBCONTRACTOR SAFETY REPRESENTATION

Each Subcontractor, while working on the Gallant Builders project, must appoint a Competent Person as their Safety Representative as defined in CFR 1926.32(f). The Subcontractor's Safety Representative can be a Superintendent, Supervisor, or other designated individual whose safety responsibilities include, but may not be limited to, the following:

1) Present on the jobsite at all times when subcontractor employees are working on the project. No exceptions.

2) Can communicate effectively with Gallant's superintendent

3) Capable of instructing workers in hazard recognition and safe work practices.

4) Capable of assembling and reviewing JHA's for each major portion of work and reviewing JHA's on a daily basis.

5) Take immediate action to correct unsafe acts and/or conditions when discovered and be able to stop the work of his employees if needed.

6) Provide, inspect, and enforce the proper use of personal protective equipment, tools, and other equipment for workers.

7) Attend supervisory safety meetings as scheduled.

8) Conduct and submit Weekly "Tool Box" Meetings with workers that include:

    a. Discussion of observed unsafe acts and conditions.

    b. Review of the accident or near miss experience of the crews and discuss corrective action taken to prevent reoccurrence.

    c. Ensure each person understands this safety plan and all other safety requirements while working on this project.

9) Immediately notify Gallant Builders of any existing hazardous condition(s) to which the workers under his/her supervision may be exposed.

10) Monitor and control housekeeping issues daily.

MEDICAL TREATMENT AND ACCIDENT REPORTING

All incidents and accidents must be reported to the Gallant Builders representative immediately. In the event of an accident or injury, each subcontractor must follow the site-specific emergency action plan.

Accidents, injuries or near miss events that occur on a Gallant Builders project SHALL be reported to the Project Superintendent (or his appointee) at the time they occur, these accidents are described as:

1. Any injury to a member of the public
2. Any injury to a contractor or a Gallant employee that requires them to leave the site for medical treatment
3. An auto or equipment accident that involves a member of the public
4. An accident that causes damage to equipment or property
5. A significant "near miss"

All accidents, incidents and near misses will require a full accident / incident report that shall be submitted to the Safety Director within 24 hours, the JHA that covered the event or task shall be included in the reports.

INJURY & ILLNESS LOG

Subcontractors must maintain a monthly first aid log of all work-related injuries & illnesses and submit the log to Gallant Builders by the end of month.

ACCIDENT INVESTIGATIONS AND REPORTS

Gallant Builders Supervisors and/or Subcontractor's Supervisors must conduct an accident investigation and complete a Supervisor's Incident Investigation Report for all injuries and incidents including close call/near miss incidents. The degree and detail of the investigation and report will be dependent upon the severity of the accident. Reports must be submitted to the Gallant Builders within 24 Hours of occurrence.

MAJOR ACCIDENT NOTIFICATION

Follow the Posted Emergency Action Plan for Fire, Medical and Environmental Emergencies. The "Crisis Management Program" will be implemented as applicable.

The Gallant Builders Superintendent shall be notified immediately for all emergencies, any injuries to project personnel and any incident that could possibly result in an insurance claim.

1) All accidents resulting in Lost Time Injuries or Property Damage will be reported to the Gallant Safety Director. A verbal notification will be made immediately and a written report will be submitted within 24 hours.
2) Major incidents will be reported to the Gallant Safety Director immediately
3) **Gallant Builders will check in** with the workmen to find out if they are being trained and if Gallant can help them with any issues that they might have. Gallant will continue to instill a culture that Gallant is here to help them.

MEDICAL SUPPORT

On-Site First Aid /CPR Supplies & Trained Individuals

Gallant will maintain a first aid kit at each site for the treatment of minor injuries to Gallant employees and the subcontractors are to set up and maintain their own first aid kits.

Each subcontractor shall provide at least one (1) individual currently trained in Red Cross or equivalent First Aid & CPR will be immediately available whenever work is in progress.

The medical care facility Gallant Builders uses is:

Occucare International
5151 Katy Freeway
Houston, TX 77007
713-802-0811

JOB HAZARD ANALYSIS (JHA)

Job Hazard Analysis are an essential part of planning safety into every project activity; JHA's are required by Gallant Builders for every task and must be completed using the Gallant JHA Form.

1) Each contractor will assemble a complete, comprehensive JHA for each portion of his work. The JHA must be clearly communicated to the workers prior to starting the task.

2) All discrete tasks with significant hazards to people or property should have a written JHA submitted to Gallant Builders designated representative.

3) Each subcontractor's supervisor shall prepare the JHA with the crew that is performing the work and members of the crew must sign off on the JHA in agreement with its content.

4) JHA's must be assembled and reviewed each morning with the crew that is using it and any changes or additions to the JHA are to be initialed by the crew.

5) When the task changes, so must the JHA.

6) JHA's shall be turned in to the designated Gallant Builders representative for review and acceptance on each specific phase of work or task before work is started.

7) Contractors shall keep their JHA's where the work is being conducted and made available for the members of the crew and Gallant management.

8) Contractors that are actively working on a task without a JHA in place will be stopped until a proper JHA can be assembled and communicated with the crew.

9) The JHA is the general task safety plan for each major portion of the work; and is also used as a daily safety plan that addresses the hazards for the day.

DISCIPLINARY ACTION POLICY & PROGRAM

Gallant Builders Safety Violation Disciplinary Action Program:

Safety violations will not be tolerated and superintendent/foreman will be held accountable for the conduct of their employees. The Superintendents and foremen are required to take action when a violation is observed and immediate action to control or eliminate a hazard is required.

All Project Personnel shall be subject to fair, consistent and constructive disciplinary action for policy non-compliance and be subject to disciplinary action for violations of Gallant policies, procedures and safety rules. Such action may include any one or more of the following depending on the severity of the violation.

All Project Personnel shall be afforded instructive counseling and/or training to assure a clear understanding of the infraction and the proper conduct under Gallant guidelines. However, nothing in Gallant's policies, procedures or this safety, health and environmental program will preclude management from terminating an employee for a safety violation.

This is not a progressive discipline system and any safety violation may lead to an employee's termination from the project without prior instruction or warning. Gallant management reserves the right to impose whatever disciplinary action it deems appropriate.

All serious and **life threatening situations,** especially fall protection and exposed energized electrical situations, will be treated on a case by case basis. The minimum action could be at least a second offense action.

REQUIRED PLANS

Site Logistics Plan

For the safety of all workers on site the Gallant Builders Project Team is required to assemble a site logistics plan prior to starting work.

1) Site logistics plans must be assembled by the project team in joint effort to separate man from machine.

2) The plan should include but not be limited to the locations of:

Eating Areas	Driveways	Concrete Washout Areas
Site Roads	Toilet Locations	Sprinkler Valves
Catering Truck Access and Egress	Muster Points	Eyewash Station(s)
Walk Paths for Workers	Fences and Gates	Hand Wash Station(s)
Loading Zones	Deliver Routes	Spill Kits
Trailer Locations	Laydown/Storage Areas	Fire Hydrants
Signage	Parking Areas	
Dumpster Locations	First Aid Kit/Stations	

3) Site logistics plans should be assembled in an electronic version that is clearly laid out and easily understood.

4) The project plan will be a "living document" and must be updated and modified as the project progresses or changes.

5) The plan must be reviewed with all workers on site at the safety orientation.

6) Contractors that operate equipment on a Gallant Builders project must be prepared to provide flaggers for their equipment when working in the proximity of other workers.

EMERGENCY ACTION/EVACUATION PLAN

Emergency Action Phone Numbers & Procedures will be posted at phones and other appropriate locations in all trailers and office space. In the event of an emergency, call 911 and indicate that the emergency is at (location).

An **Emergency Site Plan** with access gate numbers, building names, flammable storage areas **evacuation routes, muster points**, etc. indicted will be posted at strategic locations and the Plan will be updated as necessary. Copies will be maintained on site by the Gallant Builders.

The Gallant Builders **Crisis Management Plan** must be kept on site with emergency contact information kept up to date. The Plan should be immediately implemented in the event of a crisis situation.

Fire Prevention & Protection Plan

Gallant Builders will provide and maintain general duty fire extinguishers at designated locations throughout the Project. Subcontractors are required to provide their own fire extinguisher protection for hot work and work involving flammable liquids/gasses. **Hot work permits must be completed** prior to commencing a hot work activity, which may include, but is not limited to cutting, burning, welding and braising. Permits are obtained and completed at the Gallant Builders Construction Office.

(Insert local information) FIRE / AMBULANCE (Insert local phone # - (non-emergency)

In addition to OSHA, and other applicable regulatory restrictions on quantities of flammable liquids and gasses, combustible debris from trade activities will not be allowed to accumulate and become a fire hazard. Combustible waste materials should be removed from buildings daily, or as soon as possible.

Dumpsters should be kept 20' or more from buildings.

Hazard Communication (HazCom) Plan

All subcontractors shall have a site-specific Hazard Communication Program, chemical inventory list and corresponding Safety Data Sheets (SDS) / Material Safety Data Sheets (MSDS). The subcontractors complete HazCom Plan shall be accessible to all Project employees.

A copy of this plan must be submitted to Gallant for verification.

A copy of the Gallant Builders HazCom Program, chemical inventory list and SDS/MSDS will be kept onsite and employees will have unrestricted access to the Program.

Signs will be posted notifying all employees on the project of the location and accessibility of the SDS.
One or more computers should be set up to rapidly access the SIRI SDS or similar Internet site.

Demolition Plan

Prior to the start of demolition activities, the responsible subcontractor(s) must prepare and submit a demolition plan including the Job Hazard Analyses for each phase of the demolition process.

Respiratory Protection Plan
An assessment of work areas will be conducted as appropriate to determine what if any respiratory protection is necessary to prevent harm to employees from potential overexposures to hazardous levels of dust, fumes, mists, vapors or gasses. Each contractor is responsible for conducting assessments and/or sampling for respiratory hazards associated with their scope of work. A written Respiratory Protection Plan must be submitted and authorized for use by the Gallant Superintendent prior to commencing activities requiring respiratory protection.

Confined Space Plan
No one will enter a Confined Space on the Project without advance notification given to the Gallant Superintendent and Safety Director and then only as authorized by a qualified Entry Supervisor. A written Confined Space Entry Plan and the Job Hazard Analysis must be submitted to Gallant Builders and accepted by the Superintendent and Safety Director prior to entry. (A confined space is a space with limited egress, not designed for continuous human occupancy and has or could reasonably be expected to have physical hazards and/or a hazardous atmosphere.)

Steel Erection Safety Plan
The Steel Erector must submit a Steel Erection Safety Plan to Gallant Builders as required and detailed in the "Steel Erection Safety -- Attachment to Contract"

Hurricane Preparation, Severe Weather Action and Inclement Weather Plans
In the event of a predicted hurricane, severe storm warning, or inclement weather the appropriate Plan(s) will be implemented.

Excavation/Trenching and Shoring Plan
The maximum depth where no protective system is required for employees in an excavation is four feet (4') versus the five feet (5') maximum depth that may be allowed by Federal OSHA / other Standards.

An Excavation Plan including slope angle profile(s) i.e. cross-sections must be submitted and acceptable to the Gallant Project Superintendent prior to starting excavations over four feet (4') in depth.

Substance Abuse Plan
This is a DRUG-FREE WORKPLACE. The unlawful manufacture, distribution, dispensing, possession or use of an illegal intoxicating substance is prohibited on this Project. Employees are subject to Pre-employment, Random, Reasonable Cause, and Post-Incident Drug and/or Alcohol screens/tests. Failing to take or to produce a negative result for a post-accident/incident drug/alcohol test may result in disciplinary action up to and including termination, and may reduce or eliminate Workers' Compensation and/or Unemployment Compensation benefits.

*All Gallant Builders Project employees will be subject to the requirements the Drug/Alcohol Testing Program which includes: * Except where prohibited by Union Contract

- Pre-Employment -- Drug Testing
- Post-Accident / Incident -- Drug Testing
- Random -- Drug Testing
- Reasonable Cause -- Drug/Alcohol Testing
- Blanket – Drug Testing

The designated Project personnel will ensure Drug/Alcohol Testing is conducted in accordance with the Gallant Corporate Drugs, Alcohol and Other Prohibited Items Program and the Gallant Drug/Alcohol Testing Procedures.

Subcontractors and others performing work on Company Property shall have a Substance Abuse (Drug and Alcohol) Program for the project that is substantially similar to the Gallant Program. Subcontractors will be responsible for the cost of testing all of its personnel performing work under all Company subcontracts.

All questions regarding Drug/Alcohol Testing will be directed to the Human Resources Department and/or the Safety Director.

GENERAL SAFETY / HEALTH – CFR 1926 SUBPART C

Housekeeping will be made an absolute priority for all subcontractors on all Gallant Builders projects. A project that is unorganized, dirty, or is covered with trash and debris does not reflect professionalism and is indicative of an unsafe work environment.

1) All trash and debris must be removed from the work areas daily by the subcontractor who created it without exception.

2) Gallant Builders reserves the right to stop the work of a subcontractor to clean up the trash and debris they may have created.

3) Gallant Builders reserves the right to "back charge" cleanup costs to subcontractors that refuse to comply with proper housekeeping.

4) Each subcontractor should provide its employees an adequate supply of fresh drinking water and disposable cups. Used paper cups must be thrown into a trash receptacle. Water coolers must be emptied and properly sanitized each day before use. Cooler lids shall be taped in place and dated so workers will know the water is fresh.

5) Each subcontractor should supply its workers with an updated and properly stocked first aid kit.

6) Each subcontractor should have a clinic established for treatment of its employees in case of an injury where medical treatment is needed. In the event of a major injury where an ambulance is needed, the emergency crew will determine which hospital the injured party will go to.
7) Refer to the site-specific emergency action plan for detailed information.

Housekeeping -- Cleanup must be performed **Daily.** Subcontractor's failing to provide effective Safety and/or Cleanup Programs will have their requisitions adjusted accordingly.

- **Glass containers** are not permitted on site.
- Containers must be provided and used with water kegs for the disposal of **drinking cups.**
- **Protruding nails** must be removed as the work proceeds and before disposal.
- **Off cuts of welded wire mesh** must be tied into the pour or placed in a trash container as they are cut.
- **Banding iron** must be flattened and/or placed in a proper trash container as the bands are broken.
- **Off cuts of round stock** such as all thread rod and conduit must be contained as they are cut.

SANITATION

Toilets
Portable toilets and/or flush toilets meeting or exceeding the quantity specified in the OSHA Standards and/or as indicated by the vendor will be stationed and maintained in sanitary condition in reasonable proximity to work areas.

Hand Wash Stations
One or more hand washing stations with soap will be available to all project employees, preferably within or in close proximity to the toilet facilities.

HAZARDOUS COMMUNICATION (HAZCOM) - CFR 1926.59 SUBPART D

All subcontractors must submit a complete copy of their written Hazardous Communication Program to the Gallant superintendent. The HazCom plan shall include the Chemical Inventory List and copies of all SDS for the chemicals that are on site.

1) Major deliveries of flammable, combustible or toxic chemicals must be coordinated with Gallant Builders site management. Subcontractors will be responsible for SPCC, Tier II and EPA compliance for Hazardous Materials that they bring to Gallant Builders projects.

2) Refer the Gallant Hazard Communication Program for further guidance.

A HazCom area will be established at the Gallant Builders Project that is accessible to all Project employees. There will be a Project Specific Chemical Binder(s) with site specific Chemical Inventory Lists and SDS/MSDS for all contractors on site.

Signs will be posted notifying all employees on the Project of the location and accessibility of the SDS / MSDS.

A copy of the Gallant Hazard Communication Program will be kept in or near the Hazard Communication Binder and employees will have unrestricted access to the Program.

PERSONAL PROTECTIVE EQUIPMENT [PPE] - CFR 1926 SUBPART E

All subcontractors are required to provide their workers with proper PPE in which to perform their work safely. They are also required to train their employees in the proper use and maintenance of the PPE provided. PPE that is required by a contractor will be provided by the contractor.

Employees must be trained in the function and proper use of each piece of personal protective equipment prior to actual use. Training must also include proper inspection and maintenance procedures.

Proper Work Dress
Long pants, shirts with sleeves, proper work shoes/boots, safety vest, and high visibility shirts must be worn at all times.

Hard Hats

Hard hats must be worn at all times while on site. Hard Hats must be rated ANSI Type G for general hazards or Type E for electrical hazards. Hard Hats must be worn bill forward except for Field Engineers looking though survey instruments, iron workers conducting steel erection operations and welders while welding.

Welding Shields
Welding shields must be worn with a hard hat.

Eye Protection
Eye protection is required for all employees at all times. Specific protection will be necessary for high eye injury potential activities including, but not limited to: chipping, grinding, welding, cutting and drilling.

Foot Protection
Sturdy work boots or work shoes are required except that Steel Toed shoes are required for high foot impact hazard activities and full Foot Covers ("moon boots") must be used with jumping jack compactors and jackhammers.

Hand Protection
All workers are required to wear gloves when working with their hands. Glove selection shall be based on the tasks to be performed and the hazards associated with those tasks.

Hearing Protection
Hearing protection is to be worn as necessary for noisy construction activities. An assessment of work areas will be conducted as appropriate to determine what if any personal hearing protection is necessary to prevent harm to employees from potential overexposures to hazardous levels of noise. Each contractor is responsible for conducting assessments and/or sampling for noise hazards associated with their scope of work.

Respiratory Protection
An assessment of work areas will be conducted as appropriate to determine what if any respiratory protection is necessary to prevent harm to employees from potential overexposures to hazardous levels of dust, fumes, mists, vapors or gasses. Each contractor is responsible for conducting assessments and/or sampling for respiratory hazards associated with their scope of work. A written Respiratory Protection Plan must be submitted and authorized prior to activities requiring respiratory protection.

Fall Protection
Personal Fall Arrest Systems (PFFS) must be designed by a qualified and competent person. Fall protection is required for all employees exposed to a fall hazard of 6' or more above a walking or working surface on this project. Where conventional fall protection is deemed infeasible or to create a greater hazard, an alternative fall protection plan may be permitted if it is submitted in writing and authorized by the Gallant Safety Director.

All subcontractors shall submit a fall protection plan for the following activities:

1. Roofing Operations
2. Leading Edge Work
3. Scaffold Assembly/Disassembly
4. Work off ladders above 6 feet in height
5. Steel Erection
6. Elevator Installation
7. Other Hazardous Activities as deemed by Gallant

General Personal Protective Equipment Requirements:

1) Employees are required to wear a shirt with at least 4" of sleeves. Tank tops or sleeveless shirts will not be allowed.

2) **PPE, including hard hats, safety glasses, and Class II Hi-Viz safety vests or Class II Hi-Viz Shirt (when applicable), are to be worn at all times. Any exceptions to this rule will be decided by the Gallant Safety Director and Gallant Builders site management. Hardhats must be a "cap" or "full brim" style, "cowboy type" hardhats will not be allowed.**

3) Prescription glasses are not acceptable as safety glasses unless they have an ANSI Z-87 rating with side shields attached.

4) Employees are required to wear proper footwear. Leather hard sole boots are required. Tennis shoes or other soft sole shoes are not allowed. Any exceptions to this rule will be decided by the Gallant Safety Director and Gallant Builders site management. Safety toe boots may be required on some projects as a customer requirement.

5) Face shields and safety glasses are required when operating a chop saw ("quickie saw"), angle grinders, powder actuated tools and drilling overhead.

6) All workers are required to wear gloves when working with their hands. Glove selection shall be based on the tasks to be performed and the hazards associated with those tasks.

7) Contractors that provide their employees with respirators as part of their required PPE must also provide the required medical exams, fit testing, maintenance and user training. The burden of respirator use and compliance is solely the responsibility of the contractor that is using them.

8) Employees must be provided with hearing protection when exposed to excessive noise levels as described in CFR 1926.52, Table D-2.

9) Chain saw operators are required to wear hardhats**,** safety glasses, face shields, hearing protection, chaps and gloves as a minimum.

Fire Protection and Prevention - CFR 1926 Subpart F

Subcontractors should help to eliminate fire hazards by practicing proper housekeeping and proper storage of flammable and combustible products.

1) All work that creates a spark is considered "hot" work and a Hot Work Permit will be issued to the subcontractor prior to the start of work being conducted. The Hot Work Permit shall be issued for the activities conducted, kept at the work area and shall cover a one-shift period only.

2) Subcontractors engaged in welding, cutting or grinding operations must have a fire extinguisher in the area in which they are working. This operation in an unenclosed area or operational building also requires a "fire watch" to ensure that fires will not be created.

3) Employees should all be trained in the use of fire extinguishers and be familiar with the "site specific emergency action plans".

4) Fire extinguishers must not be tampered with or removed from their designated locations.

5) Smoking will only be permitted in designated smoking areas. Refer to site specific plans for guidance.

6) The project shall have a site-specific Emergency Action Plan assembled, which shall include an emergency notification system for alerting workers of emergency situations.

Gallant Builders will provide and maintain general duty fire extinguishers. Subcontractors are required to provide their own fire extinguisher protection for hot work and work involving flammable liquids/gasses.
In addition to OSHA and other applicable regulatory restrictions on quantities of flammable liquids and gasses, combustible debris from trade activities will not be allowed to accumulate and become a fire hazard. Combustible waste materials should be removed from buildings as soon as possible.

Dumpsters should be kept 20' or more from buildings whenever possible, except when located beneath a trash chute. Local Fire Department personnel should be asked to visit the site as soon as it is appropriate to acquaint them with the Project and any special hazard considerations.

Signs, Signals and Barricades – CFR 1926 Subpart G

Subcontractor employees are required to read, understand, and abide by all warning signs that are posted on site. Subcontractors are responsible to communicate safety to all their employees regardless of language barriers.

Barricades shall be used in order to alert employees to potential hazards and indicate if authorization, protective measures, or protective equipment is required.

1) Red flagging tape means **"Danger - Do Not Cross."** Yellow flagging tape means **"Caution."**

2) A tag or sign shall be affixed to each side of the barricade and the tag or sign shall be in a conspicuous location.

3) The tag / sign shall contain the following information:
   - The date the barricade was erected.
   - The reason for the barricade.
   - The name of the Supervisor responsible for the barricaded area and how they can be reached (radio channel, phone number, etc.).

4) Barricades shall be 39 inches to 42 inches high, neat, uniform, and level.

5) Barricades shall be a minimum of 6 feet back from the edge of excavations, holes, platforms, and roofs.

6) All open excavations shall be barricaded using orange barrier fence at least 6 feet from the excavation edge.

7) When personnel are exposed to a fall of 6 feet or greater, then the barricade shall be a minimum of 6 feet away from the leading edge or the vertical drop.

8) Removal or relocation of barricades or warning signs should be approved by the contractor that installed it.

9) Plastic red danger tape or plastic yellow caution tape must not be used as a warning line for controlled access zones (CAZ). Refer to CFR 1926.502(f) for guidance.

10) Employees on a Gallant Builders project are required to use designated walkways, building entrances, designated parking areas, drive only on designated site roadways and abide by all warning and directive signage.

11) City streets and thoroughfares cannot be closed without a traffic control plan that is issued from the city, county or state in which it is to be used.

Material Handling and Storage – CFR 1926 Subpart H

Subcontractors are required to keep their tools, materials, and equipment organized in a safe, professional, and efficient manner.

1) Subcontractors should use dunnage, pallets, racks or other means to keep materials off of the floor. This practice will also provide means to keep it dry and allow movement the materials with a pallet jack or a fork lift.

2) No material should be stored within six (6) feet of a floor opening or ten (10) feet of the perimeter of the building. Subcontractors are responsible for securing their own tools, materials and equipment.

3) Subcontractors are responsible for keeping their materials, equipment, and debris secure on high rise projects to prevent it blowing off the structure in high wind conditions.

4) Major material or equipment deliveries should always be coordinated with Gallant Builders site management.

5) Subcontractors will be expected to keep their storage trailers or “conex containers” in a neat and safe manner. Storage [semi type] trailers must have proper access provided as required in CFR 1926.1052(c) (1), employees are not allowed to climb in and out of semi-trailers.

6) All storage areas must have a fire extinguisher in place.

7) Flammables and combustibles must be stored as per the OSHA standards and manufacturers’ requirements.

8) Forklift operators are required to have an operator's training card on their person for the machine they are operating, and they will also be required to follow all the manufacturer's requirements for operation.

9) "Free hoisting" with a forklift is prohibited; a hoisting attachment is required when using slings or chokers to hoist loads suspended from the forks.

10) Contractors that use forklifts must be prepared to provide a flagger when driving or maneuvering among other workers or working in congested areas.

Tools, Hand and Power – Subpart I

The manufacturer's rules and guidelines must be followed for safe operations of tools.

1) No safety device should ever be removed from any tool, such as a guard or a T-handle on a hand-held grinder.

2) Grinding wheels shall be the proper size and rated for the same RPM's as the grinder.

3) Eye protection must be worn when operating any power tool. Safety glasses are minimal protection; some tools or operations may require goggles and / or face shields. Refer to the manufactures requirements for proper eye protection.

4) Operators of powder actuated tools shall have in their possession an "operator's card" or other similar documentation of training for that particular tool being used. Training must be updated as required.

5) Safety glasses, faceshield and hearing protection are required for using a powder actuated tools.

6) Spent powder actuated tool loads must not be thrown on the floor at any time and shall also be disposed of in accordance with manufacturer's guidelines.

7) The use of and hazards associated with hand and power tool use must be included in the JHA.

8) Workers shall wear tool lanyards to eliminate the possibility of a dropped hand tool falling to a lower level.

9) All electric power tools must be properly grounded or double insulated.

10) All hand and power tools must be inspected each day before use.

11) "Caution Laser in use" signage must be provided in areas where lasers are in use to warn others of the hazard.

Welding and Cutting – CFR 1926 Subpart J

Subcontractors performing cutting or welding are responsible for controlling the fire and electrical hazards they create.

1) All work that creates a spark or flame is considered "hot" work and a Hot Work Permit will be issued to the subcontractor prior to the start of work being conducted. The Hot Work Permit shall be issued for the activities conducted, kept at the work area and shall cover a one-shift period only.

2) A fire watch shall be implemented and in place for at least thirty (30) minutes after the hot work has concluded. A fire extinguisher is required during welding or cutting operations.

3) When welding operations can create arcs that could affect other workers, the subcontractor performing the welding has the duty to protect the other workers in the area from this hazard.
4) Compressed gas cylinders must be stored in the upright position, handled properly, and be secured into position. Flash arrestors or back flow preventers must be used on all oxygen/acetylene torches.

5) Employees must not work under cutting or welding operations. It is the duty or the welding or cutting crew to coordinate this operation with the other trades on site.

6) Welding leads shall be maintained and free of exposed conductors, repairs [if needed] shall comply with CFR 1926 directives.

7) No repairs will be permitted on the electrode lead.

8) Anti-flashback devices are required on the fuel side of all gas and oxygen cutting torches. Cutting, welding and other open flame work (hot work) require a hot work permit or be addressed in applicable JHA.

Electrical - CFR 1926 Subpart K

Electrical work must be performed by electricians trained for the classification of work being performed. When the subcontractor's work involves electrical work, its safety program must include training, required PPE, methods of testing, and emergency procedures specifically addressing electrical hazards.

Work will not be performed on or near energized electrical systems unless they are secured under a site specific, comprehensive lockout/tagout procedure approved by Gallant Builders. To the extent the lockout/tagout involves electrical systems in an operating facility, the process must be coordinated with Gallant site superintendent and all Owner facilities and maintenance personnel with access to the locked out circuit each day prior to commencing work. "Energized Electrical Work" will not be permitted unless a detailed JHA and Method of Procedure (MOP) is assembled by the subcontractor competent person trained in this work and approved by the Gallant Safety Director prior to starting the work.

1) GFCI protection is required on all 15 and 20 amp, 120 volt receptacles. When using "house power", welding machines or generators for 120-volt power, GFCI protection is still required. A GFCI "pigtail" may be used to provide the required protection. GFCI pigtails should be plugged in at the source of power, which will protect the extension cord and all loads down line.

2) The electrical subcontractor shall conduct an inspection of all GFCI outlets in accordance with their policy and shall provide a copy of the inspection to the Gallant Superintendent.

3) 16 gauge (or less) or flat extension cords are prohibited. All extension cords must be rated for hard or extra hard usage. All extension cords will be a "three wire type" with the ground prong in place.

4) Extension cords and electric power tools should be inspected daily before each use. Damaged extension cords, tools or equipment must be removed from service immediately. Gallant Builders reserves the right to destroy or confiscate extension cords or tools that are not safe for use.

5) Trades (other than trained electricians) must not operate circuit breakers, switch gears, motor control centers, starters, disconnects or any other electrical devices without prior approval from the electrical subcontractor's superintendent.

6) Energized electrical rooms, vaults, closets and panels must be locked to prohibit the entry of unauthorized personnel.

7) The appropriate Danger signs shall be posted on the doors of all electrical rooms, doors, panel boards, switchgears, etc. to inform workers of electrical hazards.

8) Energized equipment must have the permanent covers in place to protect workers from electrical hazards.

9) Electrical subcontractors will be expected to make the work areas free from electrical hazards.

10) Temporary lighting must be installed at least seven feet above working or walking surfaces. All lamps must have a guard.

11) Temporary High Intensity Discharge (HID) lights shall be installed and inspected in accordance to the Gallant Builders HID Lighting Policy/Procedure.

12) All high intensity discharge lamps used in the temporary lighting system shall be the self-extinguishing type.

13) When Romex, tri-plex, quad-plex, SE cables or similar wire sets are used for temporary power and lighting they must be suspended and protected from physical damage, at no time are they allowed on the floor. Type SO and equivalent hard usage cords may lie on the floor in limited areas.

Scaffolding - CFR 1926 Subpart L

All employees working on scaffolding or lifts must be protected from falls at a height of 2 feet or greater. A Competent Person for each trade that is working on scaffolds must be on site at all times while its workers are on a scaffold.

1) Scaffolds must be inspected daily prior to use by the Competent Person from each trade. Scaffolds must have a tag that indicates it is safe or not safe for use; the tag must be signed and dated by the competent person for that scaffold.

2) All employees that are required to work on scaffolds must be trained.

3) Employees engaged in scaffold erection, disassembly, or modifications must use personal fall protection.

4) Rolling scaffolds must be assembled and used as per CFR 1926.452(w) along with manufacturers' rules and recommendations.

5) "Baker" scaffolds must be used as per the manufacturers' requirements without exception.

6) Fall protection above 2 feet is required on all scaffolds.

7) All other scaffold regulations and rules will be followed per CFR 1926 Subpart L.

8) Personal fall protection is required in boom lifts and articulating boom lifts.

9) Workers are not allowed to stand on the rails of a scissor lift or aerial boom lift. Adding planks or devices for additional height is also prohibited.

10) Personal fall protection is required when operating a scissor lift.

11) Employees that use aerial boom lifts or scissor lifts must be trained in the safe and proper operation. All manufacturer's rules and recommendations must be followed.

12) Hoisting of personnel with a fork lift is only permitted if approved by the Gallant Superintendent and Safety Director.

Fall Protection – CFR 1926 Subpart M

Fall protection is required for any worker exposed to a fall of 6 feet or more with the exception of scaffolds where fall protection is required at 2 feet.

1) **When working on a ladder employees will be required to have fall protection at 6 feet or higher.**

2) Personal fall protection must be provided by a full body harness, lanyards and proper anchor points. Lanyard types and lengths must be determined by a competent person.

3) Fall protection "systems" must be designed, installed, and inspected by a qualified person or an engineer.

4) Tie off points must be capable of supporting a 5,000 pound static load per person without failure.

5) All manufacturers' fall protection equipment guidelines and recommendations must be followed.

6) Lanyards, snaphooks, and tie off points must be compatible as per manufacturer's design and directions.

7) Employees that are required to work with fall protection must be trained in the hazards, proper use, and inspection of their equipment.

8) Employees engaged in roofing operations on flat roofs will be allowed to work inside of warning line systems without fall protection provided the systems are 6 feet or more back from the edge of the roof. The warning line system must not have any openings around the perimeter unless the opening is for access to the area.

9) Monitors will not take the place of personal or conventional fall protection methods under any circumstances.

10) No employee will alter a temporary guardrail, handrail, perimeter cable or floor opening cover without specific authority from Gallant site superintendent. Any protective device removed must be replaced immediately after task is performed. Subcontractors who create a hazard are responsible for controlling or eliminating it.

11) Ropes must not be used as a horizontal life line unless it has been manufactured for the purpose.

12) Contractors that create fall hazards or any other safety hazard on a Gallant Builders project are responsible for controlling or eliminating the hazard; this will include sleeve openings or leave outs in walking or working surfaces.

13) Floor hole/opening covers must be installed and maintained by the Subcontractor creating the hole and/or the end user. The covers must be of adequate strength to support potential loads, secured against displacement and labeled as a hole cover using the designated project specific labeling system consisting of a red or orange "X". Supervisors must inform their workers of this marking method for hole covers. Hole covers greater than one foot (12") in their least dimension, shall be fastened when it can be reasonably anticipated that the covers will remain in place for an unusually long duration and/or it may be difficult to maintain the labeling.

14) Contractors may use controlled access zones (CAZ) around the building perimeter for loading upper levels with tools, material or equipment. The CAZ must first be flagged off or barricaded 100% of the perimeter, personal fall protection must be provided for all employees inside of the

    CAZ and at that time the perimeter fall protection can be removed to allow for loads to come onto the floor. The removal of perimeter fall protection within a CAZ must not compromise the remaining perimeter protection outside the CAZ. This operation must be approved by the project superintendent or his representative before starting work.

15) Fall Protection is required to be used by workers working on a scaffold that is 2' or higher.

16) Personal Fall Arrest Systems are required to be used when workers are operating an articulating aerial boom lift and mobile elevated work platforms (known as MEWP's or scissor lifts).

17) A Self Retracting Lifeline (retractable lanyard) and full body harness shall be used when operating an aerial boom lift.

18) When operating a MEWP's/Scissor lift workers may not tie-off to an existing structure.

19) All subcontractors shall submit a fall protection plan for the following activities:

Roofing Operations
Leading Edge Work
Scaffold Assembly/Disassembly
Work off ladders above 6 feet in height
Steel Erection
Elevator Installation
Other Hazardous Activities as deemed by Gallant

Motor Vehicles & Equipment – CFR 1926 Subpart O

1) If seat belts are provided, they must be worn.

2) Employees must not be transported in the back of a pickup truck, on a flatbed truck or on trailers.

3) Employees are not permitted to ride on any equipment that is intended for one person.

4) Backup alarms on equipment must not be disabled or removed.

5) Project posted speed limits must be complied with.

6) Motorized equipment must be operated in a safe and responsible manner. Equipment must have a documented inspection conducted each day before the equipment is put to use. All manufacturers' guidelines must be followed.

7) Operators of equipment or drivers of vehicles on a Gallant Builders project are not permitted to use cell phones or similar devices while the vehicle or equipment is moving.

8) Operators must not exit the seat in their equipment if a load is hoisted or the motor is running.

9) All vehicle accidents must be reported to Gallant Builders Safety Director at the time they occur.

10) Privately owned vehicles are prohibited from driving or parking on a Gallant Builders construction site except in designated areas. All company vehicles must have their company name clearly posted on their vehicles and current auto insurance is required.

11) Heavy Equipment Operators must be Employer Certified (e.g. Forklift Operator Certification) and verification of same must be submitted to Gallant Builders prior operating Heavy Equipment on site.

12) Pre-Shift Equipment Inspections must be completed and logged using applicable Inspection Report Forms for all Heavy Equipment (including skid steer loaders and forklifts). Inspection Logs must be made available upon request to any Gallant Builders Representative.

13) Random Verification Checks must be performed by Gallant Builders Project Staff to ensure Pre-Shift Operational Inspections & Tests and Reports are completed.

14) Suspension hoisting by Heavy Equipment (other than cranes) is prohibited, except when an attachment point and/or hoisting device designed and engineered for use with the specific piece of Heavy Equipment is used in conjunction with the applicable load chart. Potentially excessive movement of suspended loads must be controlled. (e.g. tag lines)

15) Heavy equipment accessory, "Quick-Hitch" attachment devices must be of the Twin-Locking (fail-safe), Fully-Automatic, type. The hitch-type must be verified by a Gallant Representative. Operators must conduct a visual inspection and operational test to ensure "new" accessories are properly attached.

Excavations – CFR 1926 Subpart P

1) **Each employee in an excavation must be protected from cave-ins at a depth of four (4) feet or more.**

2) Spoil piles must be stacked 2 feet from edge of trenches at a minimum.

3) A means of egress must be provided at every 25' of trench distance.

4) **Sloping, shoring systems or trench boxes will be used to protect employee(s) from cave-ins in excavations that are deeper than 4'.**

5) Shoring systems and trench boxes must be used as per manufacturer's recommendations, end closures are required where trenches and excavations terminate if the soil is not properly sloped or stepped.

6) All subcontractors must have a Trench Safety Plan in place for all excavations or trenches prior to commencement of work.

7) A Competent Person for excavation work must be on site at all times. The Competent Person will also be responsible for daily inspections of all excavations.

8) Trenches or excavations in excess of 20 foot deep must be designed by an Engineer.

9) Subcontractors will be responsible for keeping their excavations safe and protecting others from the hazards they may create. This protection includes barricades (only orange barrier fence) and signage.

10) Deep excavations should be considered a confined space with all applicable OSHA requirements of air monitoring, PPE, and training of personnel entering the space.

11) Contractors that are digging on the Gallant Builders project will be fully responsible for locating and excavating around new and existing utilities. All utilities should be "brought to light" by potholing, hand digging or other non-damaging methods before using heavy equipment in the proximity of utilities.

12) Contractors are required to complete an excavation permit for all excavations over one (1) foot in depth. The excavation permit must be signed by the contractor's competent person, Gallant Builders supervision / safety and kept in the field until turned in at the end of the day.

13) The contractor's competent person is responsible for determining the soil classification and the protective measures to put into place to protect the entrant's.

14) The contractors shall provide Gallant with the manufacturer's tabulated data/rating information for all protective systems used to protect their employees.

Concrete and Masonry – CFR 1926 Subpart Q

1) Vertical rebar posing an impalement hazard must be protected from impalement hazards, vertical rebar must also be protected when employees are working above them.

2) Horizontal rebar that poses a scratch hazard must also be protected.

3) Mushroom (round) rebar caps shall not be used to protect workers from impalement and/or scratch hazards

4) Employees assigned to mixing of dry cement base products must be protected from the inhalation of dusts.

5) Employees pouring, placing, finishing, mixing or patching concrete must be protected from the exposure of concrete products (wet or dry) to the skin.

6) Form materials or lumber must be free of nails that could cause puncture hazards. Nails should be bent over or removed.

7) Pier drilling operations require 100% fall protection for the crew tending the hole on piers that are greater than 18" in diameter, the use of "hay rings", barricades or personal fall protection systems with tie off points are accepted practices.

Steel Erection - Precast Erection – CFR 1926 Subpart R

Erectors are required to submit a site-specific steel / precast erection plan before starting the steel erection process. This plan must be reviewed and approved by the Gallant Safety Director and site superintendent prior to starting work.

1) **Steel Erectors must use 100% fall protection for all of their activities without exception.**

2) Trades other than Ironworkers are not allowed to work under erection activities.

3) The "site specific erection plan" will be expected to lay out the complete safety plan for the erection of the structure(s).

4) Multiple picks or "Christmas treeing" of similar structural steel members may be allowed if all the criteria in CFR 1926 are met.

5) Erectors must inspect their rigging each day before use. Defective rigging or rigging that is not properly tagged will be removed from use.

6) Erectors will not be permitted to hoist workers with a crane without the approval of Gallant Builders site management. All criteria in CFR 1926.1431 must be met as a minimum.

7) Precast erectors must have an approved "engineered" erection plan for their operations prior to starting work. The plan shall include (but not limited to) grouting plans, bracing details, welding procedures and the sequence of setting the precast sections. Erection plans for precast must undergo a third-party engineer's review.

8) Erection plans must include a comprehensive fall protection plan detailing the fall protection methods for their activities.

9) Engineered plans will be required for rigging and hoisting of precast members.

10) Cranes used for hoisting precast should be large enough to safely hoist all anticipated loads, multiple critical lifts should be avoided.

For Subparts S, T, U, V, W & Y

Refer to OSHA 1926 Regulations.

Ladders and Stairs – CFR 1926 Subpart X

1) **Fall protection is required when working on ladders in excess of 6 feet.**

2) All employees who use ladders must be trained.

3) Ladders must be inspected each day prior to use. Defective ladders must be removed from service.

4) The manufacturer's recommendations and safety rules must be followed at a minimum, ladders that do not have the manufacturer's labels in place should be removed from service.

5) Although personal fall protection is required on ladders when working at or above 6 feet, when employees are on ladders and working above or close to perimeter or interior fall hazards, they must use personal fall protection regardless of standing height on the ladder.

6) Steel stair pans are not to be used for access until they are filled with blocking or concrete and a handrail/stair rail system is in place.

7) Stairs must be blocked or barricaded until they are safe for use.

8) All job-built ladders must comply with ANSI A14.4-1979 and must be inspected and tagged each day. Job-built ladders in excess of 20 feet will not be permitted.

9) Elevation changes in walking surfaces greater than 19" will require a ladder, steps or stairs for safe access.

10) Extension ladders SHALL be set up at a 4 to 1 ratio, extend at least 3 feet above the upper landing, and tied off at the top to prevent movement.

11) Employees are forbidden to stand on the top step or on the top of any step ladder even when fall protection is provided.

12) All ladders used on Gallant Builders projects shall be rated for 250 lb. capacity or greater.

13) Trestle ladders are not permitted on Gallant Builders projects.

14) Aluminum ladders are not permitted on Gallant Builders projects.

Confined Spaces in Construction – CFR 1926 Subpart AA

Refer to the Gallant Builders Confined Spaces in Construction Program and OSHA CFR 1926 Subpart AA Regulations.

Cranes – CFR 1926 Subpart CC

All cranes must be thoroughly inspected and certified as safe for use by a qualified 3rd party inspection firm at least annually, and evidence of the inspection must be retained on the crane at all times. All crane operators must provide a recent drug test and be certified to operate the specific crane or demonstrate at least 2 years of operation on the same or similar crane under similar conditions.

1) The manufacturers' operation manuals and load charts must be with the crane at all times; daily documented inspections are required on all cranes by a qualified person.

2) Crane procurement and operational pre-planning is required on all Gallant Builders projects, planning must include, but not be limited to:

Weight of loads to be hoisted
Public areas within swing radius
FAA compliance
Delivery plans and routing
Soil stabilization
Disassembly processes
Designated flaggers
Critical lifts
Overhead power lines
Underground utilities
No fly zones
Other cranes on site
Swing radius
Assembly areas
Erection processes
CCO operators
Inspection processes
Rigging operations
Communication plans
Tower crane foundations

3) Cranes that are on the Gallant Builders project must have an "independent third party" inspection completed before they will be allowed to hoist a load. The annual inspection on a crane will not satisfy this requirement regardless of the date that it occurred.

4) An "Assembly / Disassembly Director" must be appointed before a crane can be assembled or disassembled, this A/D Director must be qualified and competent to supervise this task and direct his crew as per the manufacturer's guidelines or guidelines he has created for a safe process.

5) All crane operators must possess a certification to operate the type of crane they are using, CCO or equivalent is required. Operators should have at least two years of experience with the crane they are to operate.

6) The crane operator is ultimately responsible for safe operation of his crane and he has the right to stop work if he feels the hoist or maneuver could be unsafe.

7) Before crane operations begin, flagmen must be designated. Flagmen must be kept to a minimum for each crane on site, two flagmen per crane is the recommended practice.

8) The ground conditions must be properly graded and compacted before a mobile crane can be used to assure that it will support the crane, rigging and all intended loads without failure.

9) All safety devices and operational aids on a crane must be functional and never removed or altered.

10) The swing radius of the crane's counterweights must be barricaded or flagged completely.

11) All cranes must be equipped with a 5BC rated fire extinguisher.

12) Cranes must not work in the proximity of power lines until the line voltage has been determined; at that point refer to CFR 1926.1407-1411 for guidance.

13) A lift plan shall be submitted to Gallant supervision for review.

14) "Safety factors" of any kind will not be considered when calculating crane loads, the load chart must be considered 0%-100% of the crane capacity. Load charts and computer programs must match the configuration of the crane assembly (boom length, jib lengths, counter weights added, etc.).

15) "Critical lifts" will require prior approval by the Gallant Safety Director and the site superintendent. Critical lifts are those that require two cranes to hoist the same load or using a single crane to make a lift that is greater than 75% of its load charts.

16) Tag lines will be used on all crane loads.

17) Anyone that is performing rigging or flagging with a crane must be trained regardless of trade.

18) Hoisting operations must not be made over persons not directly involved with the hoist.

19) Rigging must be inspected by a competent person each day before use. Defected rigging or rigging that is not properly tagged must be removed from service.

20) Wire rope slings, alloy chain slings, synthetic web slings, round slings, etc. must all have a Manufacturers' tag permanently affixed that indicates the safe working loads and other pertinent information. Tags must be legible and must not be altered or modified.

21) Sling inspection must be conducted as per ANSI / ASME B30.9.

22) Tower cranes must be erected; load tested, calibrated and operated as per the manufacturers requirements.

23) When one or more tower cranes are erected in the same area and have the ability to make contact anti-collision devices shall be installed to help prevent accidental contact.

24) Tower cranes that have the ability to fly over public areas shall be fitting with zone control devices to assure the public is safe from the hoisting operations.

25) Cranes that have been shock loaded or damaged must be taken out of service until repairs and re-certifications have been completed.

26) Cranes may not be erected on site unless communications have been made with the FAA to assure that the crane will not interfere with air traffic.

27) Clear communications must be established and maintained between flagmen and crane operators and operator to operator, the use of radios with a designated channel for each crane is a recommended practice.

28) Cranes must have a properly functioning "anti-two-block" device for each load hoisting line. This requirement may be waived by a Gallant Builders Representative for certain crane operations, e.g. pile driving leads.

29) Load lines (hoist lines) may only be "tied-back" to the crane using a method acceptable to a Gallant Builders Representative, which must include a "back-up safety system."

30) Palletized loads may only be suspension-hoisted overhead using one of the following methods:
    a. Hoisting Forks of adequate capacity with the load stable and secured to the pallet.
    b. Equipment Lifting Eyes with the pallet removed.
    c. Properly rigged Hoisting Container.
    d. An alternative method authorized by a Gallant Builders Representative.

Hoists – Material/Personnel

Hoists must be inspected and tested following erection or "jumping," and every 3 months thereafter by a 3rd party Crane Inspector acceptable to Gallant Builders. A detailed Inspection Report must be completed by the Inspector that ultimately Certifies that the Hoist ("Device") "Meets" or "Passed" the examination / inspection. i.e. no uncorrected deficiencies. A copy of the report must be submitted to Gallant Builders for review and consideration.

Gallant Builders will collect a hard copy of hoist operator qualification documentation, file and log into a tracking database

Permit to Work Systems

Permits-to-work provide a formal safety control system aimed at prevention of accidents, damage to property and damage to products,

It is probable that it would be necessary to obtain permits-to-work during the following operations:

- Asbestos Abatement
- Confined Spaces
- Core Drilling
- Demolition
- Electrical Hot Work
- Electrical Shutdown and Start-up
- Elevator Shaft Work
- Excavations and Trenching
- Gas Line Services
- High and Low Voltage Electrical Works
- Hot Works – Welding, cutting, brazing, operations generating a spark
- Impairment of Fire Protection Systems
- Restricted / Hazardous Areas
- Testing Pressure Systems
- Using Toxic/Hazardous Chemicals
- Work on Lifts

General Public Protection

Gallant Builders will provide perimeter fencing and/or other appropriate measures as necessary for separating and protection the general public from construction activities. The perimeter sidewalks, entrances and roadways will be included in the Project Safety Surveys to address activities and/or conditions that could be harmful to the general public or the environment

An adequate number of properly trained and equipped flaggers must be provided to ensure public safety where construction activities may endanger pedestrian or vehicle traffic.

Site Specific Safety Considerations

Work control measures
Subcontractor project management/supervision must submit a site-specific Safety program and JHA for each

phase of their work to the Gallant Builders and attend a Pre-Construction Meeting that includes Project Safety requirements and hazard prevention planning.

Subcontractor employees must attend a New Employee Project Orientation that includes Basic Safety & Health Training and thereafter a Weekly "Tool Box Talk" Safety Meeting.

On-site Safety inspections will be performed by each subcontractor and Gallant Builders Management. Safety violations will be addressed immediately and if warranted follow the disciplinary procedures.

Moisture Damage Prevention

Materials prone to fungal growth (mold) after becoming moist, such as drywall, insulation and lined ductwork, must be stored off the floor/ground on dunnage and covered.

Materials prone to fungal growth must be checked following a potential moisture exposure event, and then thoroughly dried or removed immediately (process completed within 72 hours) if moist conditions are discovered. Materials with visible fungal growth (mold/mildew) must not be removed or otherwise handled without the authorization and oversight of the Safety Director and compliance with the Mold Prevention Plan (MPP). Consult the Safety Director for details.

Power Actuated Fastening Tools

The firing mechanism shall be designed so that the tool cannot fire during loading or preparation to fire or if the tool is dropped while loaded. Firing the Power Actuated Fastening Tool shall be dependent upon at least two separate and distinct operations of the operator. Each Power Actuated Fastening Tool is required to have a manufacturer's redundant safety system (two safeties).

Overhead Protection

At no time will one trade work over/under another unless the activities are planned as such, and precautions as specified in a Job Hazard Analysis are implemented to prevent injury from falling objects.

Gallant Builders will provide designated overhead protected entrances/exits.

Overhead protection will be provided using designated overhead protected entrances/exits and a minimum of one of the following methods or an equivalent.

1. Orange barrier fencing will be installed on all access levels below open sided exterior and atrium floors to restrict access to the protected entrances/exits. Additionally, debris and materials will be secured or kept a safe distance from the edge. Gallant will paint a line ten feet (10') inboard from open sided floors edges where feasible to delineate "Debris and Material Storage Free Zones" for the purpose of overhead protection.
2. Toe boards and /or vertical debris netting (secured at the floor) installed and maintained along open edges below which employees may walk or work.

Shafts without pits will be covered or have guardrails with toe boards and/or be barricaded at the bottom floor.

All employees are to be made aware as to the markings and methods of overhead protection provisions implemented by Gallant Builders and the Project Subcontractors.

Supervisors shall direct the employees in their charge to comply with the access restriction system and use only the overhead protected access points.

Employees shall not remove or by-pass any of the overhead protection devices unless authorized and directed to do so by their Supervisor or a Gallant Builders Supervisor.

Alternative provisions to ensure overhead protection for others are the responsibility of the Supervisor during activities where the Supervisor's employees have removed or compromised the standard protection provisions. An exclusion zone delineated with self-supporting barricades.

Employees are responsible for notifying their Supervisor of the need to remove overhead protection devices and the proper replacement of the devices. Employees are to notify their Supervisor of defects or deficiencies of protection.

General Rules

1) All personnel on the Gallant Builders project are required to attend a safety orientation prior to starting work. Some projects may have badging processes, drug screens, background checks or other customer requirements.

2) Contractors that employee temporary labors are fully responsible for their safety and their actions. Temporary labor should go through a “site specific” orientation with their contractor to assure they understand the site rules, their limitations, who they report to and what they are expected to do.

3) Unsafe conditions or unsafe acts should be reported immediately to your Supervisor for correction.

4) Employees on the Gallant Builders project shall not be permitted to work alone; employees shall always be close enough (within “ear shot”) to another worker(s) that they could get help if they needed it.

5) Report all injuries, regardless of how slight, to your Supervisor or to the Gallant Builders assigned Safety Manager when they occur.

6) Fighting, creating a disturbance, threats against others, bad attitudes or horseplay will not be tolerated and are grounds for dismissal from the project.

7) All employees are expected to act in a professional manner. Sexual harassment of any kind will be grounds for removal from the Gallant Builders project.

8) Site specific smoking and tobacco use rules must be followed, some projects may not allow smoking at all.

9) All employees should be trained in proper lifting techniques.

10) Glass containers of any kind are not permitted on the jobsite.

11) Radios are not allowed on the Gallant Builders projects; this also includes personal radios with headphones or earphones.

12) All persons on the Gallant Builders project are expected to exercise safe behavior which includes having the proper attitude, looking ahead and making the commitment to work safely. Safety belongs to all of us and it is the utmost importance that we take care of ourselves and each other on a daily basis.

We must all "Make Safety Personal"

General Personal Protective Equipment (PPE) Requirements:

All employees are required to wear the following PPE while onsite:

1. Hard hat
2. Safety Glasses
3. Class II Hi-Viz Safety Vest or Class II Hi-Viz Safety Shirt operations. This level of PPE may also be required for interior projects.
4. Sturdy leather work boot
5. Long Pants
6. Shirt with a 4" sleeve
7. Gloves appropriate for the task

EPA Compliance

1) As contractors are obligated to abide by all laws and regulations for EPA compliance, and Gallant Builder's responsibility under any environmental permits and NOI's for such compliance is shared by all subcontractors.

2) Each subcontractor will be liable for any damage he causes to silt fences, inlet protections, retention ponds, stabilized entrances or any other Best Management Practice (BMP's) that are in place. If BMP's are in the path of work, this should be communicated to the Gallant Builders site superintendent for coordination.

3) Subcontractors will be liable for dumping any chemicals, trash or debris on site or in trash receptacles in violation of Federal, State or municipal environmental laws.

4) Subcontractors are responsible for proper storage of their fuels or bulk chemicals that may require secondary containment, dikes, emergency spill plans, etc.

5) Subcontractors that track mud into streets will be responsible for **immediate cleanup**.

6) Water cannot be pumped from the work site into streets or storm inlets without prior approval from Gallant Builder's superintendent.

7) Spills or contaminations of soil will be the responsibility of those that created it to clean it up and see to its proper disposal.

Note:

This Exhibit is **a basic set of safety guidelines and expectations** that are intended for use as a subcontract document and reference.

This Exhibit is not an all-inclusive safety program.

If additional information or guidance is required refer to CFR 1926 or whichever regulations have presence in the location of the project.