



**Piedmont Henry Hospital Renovation Project
STRATEGIC PARTNERSHIP**

Between

**Occupational Safety and Health Administration
Area Office,**

And

Brasfield & Gorrie, LLC

I. PURPOSE/SCOPE

This Partnership was developed jointly by the Occupational Safety and Health Administration (OSHA), and Brasfield & Gorrie, LLC (Brasfield & Gorrie). The Georgia Institute of Technology On-site Safety and Health Consultation Program (Georgia Tech) will also serve as a stakeholder to this Partnership. Georgia Tech will support the Partnership for the benefit of small employers engaged as subcontractors on the jobsite. To facilitate the goal of reducing occupational related fatalities and serious injuries within the construction industry, OSHA and Brasfield & Gorrie will implement an agreement (Agreement) under the OSHA Strategic Partnership Program (OSPP). The common objectives and goals of the Partnership will include the following:

- A. Reduction in injuries and illnesses;
- B. Increased safety and health training;
- C. Reduction in the exposure of workers to health and safety hazards; and
- D. Increased numbers of employers with comprehensive safety and health management systems.

This Partnership will cover the renovation project for the new bed tower and new operating suites at Piedmont Henry Hospital. Piedmont Henry Hospital renovation project (Project) will add a new patient tower, with 95 additional inpatient rooms, three additional state-of-the-art operating suites, additional parking facilities, a new hospital kitchen/cafeteria and food service venue, a lobby addition, and a new central utility plant. Construction on this project is scheduled to commence in 2024 and is anticipated to span almost three years.

By combining their efforts, skills, knowledge and resources, OSHA, and Brasfield & Gorrie, and Georgia Tech expect to reduce exposure to hazards and thereby decrease the possibility of serious injuries and fatalities at the construction site. This Partnership is consistent with OSHA's long-range efforts to develop a contractor/ government Partnership approach to safety management. It allows for better use of OSHA resources and innovation in safety management. It also encourages more participation in the safety process from the construction community.

II. IDENTIFICATION OF PARTNERS

The Partnership will include:

- Occupational Safety and Health Administration (OSHA)
- Brasfield & Gorrie, LLC

The Partnership Stakeholder(s) will include:

- Georgia Tech On-site Safety and Health Consultation Program

III. GOALS/STRATEGIES/PERFORMANCE MEASURES

The primary objective of this Partnership is to create a working relationship that focuses on 1) preventing work-related fatalities; 2) controlling or eliminating serious workplace hazards; and 3) establishing a foundation for the development of an effective safety and health program. The goals employed to achieve these results will include the following:

GOALS	STRATEGIES	MEASURES
<p>Reduce the total number of injury and illness cases by 10 percent, thereby providing a safe and healthy work environment for employees at the Project.</p>	<p>1) Review the OSHA 300 log data of the Partnership participants. Review injury and illness trends and implement effective corrective action(s).</p> <p>2) Calculate the employer's Total Case Incident Rate (TCIR) and Days away from work, restricted, or job transferred (DART) ¹rates.</p> <p>3) Prior to contracting with a sub, they must pre-qualify: This includes review of employer modification rate (EMR), TRIR and OSHA 300 Logs. If certain criterion is not met, additional measures may be implemented to raise the performance of the sub.</p>	<p>a) This goal will be measured by the number of companies participating in the Partnership, which reduce their TCIR and DART rates below the baseline for the Partnership.</p> <p>b) The baseline will be established by the 2022 BLS Rates for Non-Residential Construction NAICS 2362, which is 1.7 and 0.9.</p>
<p>Effectively control workplace hazards by increasing the number of construction companies with safety and health management systems (SHMS). This may be accomplished by using OSHA's Safe + Sound as a model (To include Management Leadership; Worker Participation; and Find & Fix Hazards).</p>	<p>1) Methods to evaluate the participants' performance in this area will include the implementation of comprehensive safety and health management systems and an increase in the number of employers that establish effective safety and health management systems.</p> <p>2) Review the number of employers establishing safety and health programs, based on the Safe + Sound model. These items may include, but are not limited to, the following: safety and health policies statement; job hazard analysis; accident investigation; and hierarchy of controls.</p>	<p>a) Compare the number of participants that develop and implement effective SHMS as a result of participating in the Partnership, to the baseline for the Partnership.</p> <p>b) The baseline will be established during the initial year of the Partnership.</p>
<p>Increase the number of employees, employers and supervisors who are provided effective safety and health training.</p>	<p>1) Review the number of the employers that establish effective safety and health training programs, including the OSHA 10-hour/ OSHA 30-hour courses.</p> <p>2) Require all subs to have a 30-hour trained competent person on site at a minimum.</p> <p>3) Provide quarterly jobsite training relevant to current conditions. This may include fall protection, heat awareness, trenching and shoring, mental health, tool tethering, and others.</p>	<p>a) Provide or assist in providing necessary training.</p> <p>b) Compare the number of employees provided safety and health training, as a result of participating in the Partnership, to the number of employees provided training during the baseline (initial) year of the Partnership.</p>
<p>Conduct effective self-inspections, sampling, monitoring, training, and consultative activities in areas where employees might be exposed to health and safety hazards such as the following: hazardous noise levels; lead; silica; asbestos; ergonomic stressors; and other hazards. The overall outcome of this goal should be the reduced exposure of workers to health and safety hazards.</p>	<p>1) Track health and safety hazards related program improvements, as well as training focused on the prevention of health and safety hazards.</p> <p>2) The Brasfield & Gorrie will track the number of self-inspections and site audits, as well as the number of health and safety hazards identified during these activities.</p>	<p>A comparison will be made between the number of health and safety hazards identified during self-inspections and audits conducted during the (baseline) initial year of the Partnership.</p>

¹Days Away from work, Restricted, or job Transferred (DART) rate: This includes cases involving days away from work, restricted work activity, and transfers to another job. It is calculated based on $(N / EH) \times (200,000)$ where N is the number of cases involving days away, and/or restricted work activity, and/or job transfer; EH is the total number of hours worked by all employees during the calendar year; and 200,000 is the base number of hours worked for 100 full-time equivalent employees. For example: Employees of an establishment including management, temporary, and leased workers worked 645,089 hours at this worksite. There were 22 injury and illness cases involving days away and/or restricted work activity and/or job transfer from the OSHA 300 Log (total of column H plus column I). The DART rate would be $(22 / 645,089) \times (200,000) = 6.8$.

IV. OSPP MANAGEMENT AND OPERATION

A. Brasfield & Gorrie Team will:

1. Establish a jobsite safety walkaround team, to include a representative of all primary trades active on site, to develop an understanding and awareness that all accidents are preventable. This action will be accomplished by implementing the Brasfield & Gorrie's Safety Vision, a comprehensive safety and health management system, which includes:
 - a. Management commitment and employee involvement;
 - b. Hazard analysis;
 - c. Hazard control; and
 - d. Arrangement of training assistance for other stakeholders on site.
2. Mentor subcontractors in safety and health management systems. The term "subcontractors" shall include all multi-tiered subcontractors that arrive for work on the site.
3. Where the potential for air borne silica exposure exists, personal air monitoring will be conducted to assess employee exposure levels. In addition, where the potential for airborne silica exposure exists, require the use of wet cutting and/or dust collection system in compliance with Table 1 of 29 CFR Part 1926.1153. Approved respiratory protection is required in accordance with 1926.1153(e)(1). Where the potential for other health issues exists (i.e., carbon monoxide, lead, or large-scale use of chemicals in the building interior during floor finishing), Brasfield & Gorrie will coordinate with the subcontractor responsible for creating the hazard and ensure that air monitoring is accomplished to assess employee exposure levels. Brasfield & Gorrie and Georgia Tech will compile and track sampling results.
4. Have the authority to enforce safety rules and regulations. This enforcement authority will include holding contractors and employees accountable for following safety rules and regulations and, if necessary, remove contractors' employees and supervisors from the job site, following proper disciplinary procedures.
5. Ensure that a competent person performs a risk assessment of all fall hazards. The probability and severity of occurrence for each identified hazard will be evaluated to eliminate or reduce risks through conventional fall protection, engineering, or administrative controls to as low a level as possible. Regarding fall hazard risk assessment:
 - a. Critical risks will not be tolerated. A critical risk is defined by work that contains high probability in occurrence and high severity in consequence. No work will be performed until action is taken to reduce the level of risk to as low as reasonably feasible.
 - b. Bricklayers performing overhand bricklaying and related work above lower levels must be adequately protected. No fall protection "safety monitoring" system will be allowed.
 - c. Workers on the face of formwork or reinforcing steel must be protected from falling by personal fall arrest systems, with the use of a positioning device and/or lanyards.
6. Ensure that serious ergonomic hazards are identified and corrected.

7. Ensure that ground fault circuit interrupters (GFCI) are used to protect all electrical circuits that are installed for work. All contractors will ensure that employees are protected using a GFCI at all times.
8. Ensure that Brasfield & Gorrie Project Managers and Safety Directors serve as points of contact, monitoring safety and health at the site and its progress toward achievement of the Partnership goals.
9. Confirm that Brasfield & Gorrie management, to include Superintendents, Construction Managers and Project Managers, verify that weekly Safety Audits are conducted (since this is a multi-employer worksite and all workers are to work together on safety issues). Upon request Brasfield & Gorrie will review subcontractors' daily reports and audits, note any hazards found, and then review the results with all Safety Committee members at the weekly coordination/subcontractor meeting.
10. Conduct and document weekly jobsite safety meetings/toolbox talks.
11. Submit monthly accident reports to the Project Safety Committee, including first aid, injury, property damage and near miss reports.
12. Continually evaluate the Partnership's effectiveness and make recommendations for improvements.
13. Ensure that no employees are allowed to work directly below a suspended load except for: employees engaged in the initial connection of steel and employees engaged in work necessary for hooking or unhooking the load. In these rare cases where no other safe alternative may exist, the following criteria must be met: materials being hoisted shall be rigged to prevent unintentional displacement; hooks with self-closing safety latches or their equivalent shall be used to prevent components from slipping off the hook; all loads shall be rigged by a qualified rigger. Appropriate use of tag lines will be utilized to prevent work below suspended loads.
14. Require the use of appropriate personal protective equipment. A 100 percent eye protection and glove program will be implemented. Employees on-site shall wear high-visibility reflective clothing.
15. Ensure that all safety signs and warnings will be posted in English and Spanish, as well as in any other languages spoken frequently by limited English proficient workers on-site.
16. Implement a 100 percent Fall Protection Plan for all work performed 6 feet or more above lower surfaces.
17. Implement an effective Heat Illness Prevention Program (Heat Program) to educate workers about the hazards of working outdoors in the heat and steps needed to prevent heat-related illnesses. This should utilize tools such as OSHA's Heat Safety Tool Smartphone App and the National Weather Service Alerts and Advisories.
18. Provide all data to OSHA that is needed for the annual OSHA Strategic Partnership Program (OSPP) evaluation report.

B. Subcontractors will:

1. Appoint a representative to the site Safety Committee responsible for resolving job safety matters and serving as a liaison to Brasfield & Gorrie. Every prime trade contractor will have a person available to participate in the Safety Committee. Participation in this committee will consist of, but will not be limited to, participation in the Holder safety walkthroughs and monthly Safety Committee meetings.

2. Conduct jobsite safety inspections for those employees under their control. These jobsite safety inspections will be in addition to the daily general inspections. If non-compliant activity or hazards are discovered, immediate correction is required. Documentation of abatement methods and verification must be submitted to the appropriate Brasfield & Gorrie Safety Director.
3. Participate in the weekly Safety Committee/subcontractor meetings and safety audits. Non-compliance must be corrected immediately. Abatement methods and verification must be submitted to the appropriate Brasfield & Gorrie Safety Director who will document the correction taken and share this information during the monthly update meetings.
4. Share the results of jobsite inspections with all workers by posting them in the Project office or on the jobsite bulletin board, to ensure all workers are notified of the results.

C. OSHA will:

1. Participate, to the extent resources permit, in the quarterly meeting with Partnership participants, but will not participate in the walk around inspection, except that the verification visits may be scheduled as part of the weekly walk around inspection.
2. Serve as a resource and liaison for Partnership participants and also assist with safety and health training, as resources permit.
3. Give priority to the construction project when technical assistance is needed.
4. Audit the monthly reports/documents and make recommendations for improvements in the meeting of Partnership goals.
5. Conduct inspections in accordance with sections VIII and IX of this Partnership.
6. Conduct the annual Partnership evaluation report in accordance with section VII of this Partnership.

D. Georgia Tech will:

1. Perform quarterly jobsite inspections, to the extent resources permit.
2. Give priority consideration to requests for services to small contractors who are engaged in work at the Project.

V. SAFETY AND HEALTH MANAGEMENT SYSTEM

Brasfield & Gorrie will use their systems to collect and analyze injury and illness trends (including near-miss incidents) by all contractors performing work at the site. This data will be used as a tool to ensure continual safety and health improvement at the site. The management of this agreement will be accomplished by Brasfield & Gorrie implementing a comprehensive jobsite safety and health management system, which includes:

1. Using Brasfield & Gorrie - Job Hazard Analysis (JHA) and Pre-Task Plan forms, Brasfield & Gorrie will complete a risk assessment prior to exposing any employee to potential safety and health hazards.

2. Working with OSHA, Georgia Tech, and Safety Committee members to provide the resources to conduct initial monitoring for ALL toxins, carcinogens, or hazardous substances currently emphasized by OSHA and which present inhalation hazards, such as but not limited to silica, lead, cadmium, and/or isocyanates. Employee exposures will be assumed, and respiratory protection worn until the results of the initial monitoring studies are received and demonstrate no exposure problems or prior surveys show no hazard exists. Brasfield & Gorrie will endeavor to ensure that no work with these materials will occur, thus preventing any exposure. Brasfield & Gorrie will endeavor to ensure that no work with these materials will not occur, thus preventing any exposure. Brasfield & Gorrie request periodic evaluation visits by Georgia Tech.
3. Ensuring all contractors on-site will perform daily verification of safe activities and a Pre-Task Plan (PTP). In addition, once each month, a review of the jobsite will be performed. A representative of the subcontractors will be a safety participant in the jobsite areas where their employees may be exposed to hazards. Any hazards found during the reviews will be corrected promptly. Items identified during the reviews will be annotated on a daily log. When hazards cannot be corrected immediately, they will be tracked until abatement is completed. Employees exposed to these hazardous conditions will be informed of the hazard and effective interim control measures will be implemented. A record will be kept of all hazards found during the comprehensive site safety reviews and the number of hazards corrected as a result of the weekly reviews.
4. Implementing an effective Fall Protection Plan to include fall protection in all cases where work is being performed 6 feet or more above lower surfaces.
5. Ensuring employees receive safety and health training for the construction industry as follows:
 - a. Supervisory personnel should possess an OSHA 30-hour card or its equivalent. Brasfield & Gorrie will work with all subcontractors to provide each subcontractor's safety designee with an OSHA 10-hour training.
 - b. All employees will receive a site-specific construction safety orientation covering jobsite safety and health issues, procedures related to the work being performed, as well as the requirements outlined in this Agreement. In addition, employees shall receive training on the content of the risk assessment for operations they will encounter. This may require periodic retraining of employees on the content of the risk assessment as they become relevant due to entering new phases of construction. Brasfield & Gorrie will provide this material to each subcontractor has designated safety representative for completion.
 - c. Safety and health training will be provided to all workers in a language they understand. Bilingual instructors will perform all trainings for limited English proficient workers. Brasfield & Gorrie will provide a list of instructors to all subcontractors to ensure that all workers are effectively trained.
 - e. Hazard-specific training will be conducted on an as-needed basis.
 - e. Subcontractors can utilize other instructors as long as these instructors can provide a valid certification card showing completion of the OSHA 30-hour course. Brasfield & Gorrie will have primary responsibility for coordinating this training; however, as resources allow Consultation will also provide assistance.
6. Mandating that each subcontractor with written safety and health management systems must submit them to Brasfield & Gorrie for evaluation. Companies without safety and health management systems may adopt Brasfield & Gorrie Incident Prevention Plan or develop an adequate safety and health management system with the assistance of Georgia Tech.

7. Ensuring Brasfield & Gorrie and/or the affected subcontractors adequately address health-related issues, which arise during the Project, with the assistance of OSHA, as its resources permit, and Georgia Tech. All health-related issues will be discussed monthly during the Partnership meetings. In addition:
 - a. An effective environmental monitoring program will be implemented to control airborne hazards, such as silica, and will include personal monitoring, employee training, implementation of engineering controls where possible, and the use of respiratory protection when necessary. Previous site-based data will be considered acceptable.
8. Ensuring compliance with the NFPA 70E when working on live electrical equipment, including training and the availability and use of personal protective equipment. A permit system will be implemented whenever working in close proximity to or on live electrical systems to ensure the implementation of appropriate protective measures prior to exposure. The permit form includes requirements for pre-task review and lockout/tagout procedures to be followed.
9. Ensuring effective programs are employed, consisting of policies and procedures that comply with OSHA's Lockout/Tagout standards, as equipment and processes are brought live and on-line at the Project.

VI. WORKER INVOLVEMENT

The site will establish an employee Safety Committee consisting of one member per key subcontractor that will meet on a monthly basis to share the results of jobsite inspections, information concerning accidents and near misses, and suggestions for improvement and recommendations for training of the general workforce. Near misses and daily safety observations will be discussed during toolbox talks.

VII. ANNUAL EVALUATION

The Partnership will be evaluated on an annual basis using the Strategic Partnership Annual Evaluation Format as specified in Appendix C of OSHA Instruction CSP 03-02-003, OSHA Strategic Partnership Program for Worker Safety and Health.

Brasfield & Gorrie will be responsible for gathering required participant data to evaluate and track the overall results and success of the Partnership. This data will be shared with OSHA. OSHA will be responsible for writing and submitting the annual evaluation.

VIII. INCENTIVES

Participant benefits from OSHA may include:

1. Maximum penalty reductions for good faith and history, to the extent allowed by the OSHA Field Operations Manual (FOM), OSHA Instruction CPL 02-00-164 (April 14, 2020).
2. In the event that a citation with penalties is issued, the Area Director has the authority to negotiate the amount of an additional penalty reduction as part of the informal conference settlement agreement, which is consistent with OSHA's current policy regarding this matter.
3. Priority consultation service and assistance for small employers working on the construction site from Georgia Tech.

4. An OSHA-focused inspection is available where the Partnership participant has an effective safety and health management system fully compliant with 29 CFR Part 1926.20 and 29 CFR Part 1926.21 (For additional details refer to the Focused Inspection in Construction August 22, 1994, memo signed by then Deputy Assistant Secretary for OSHA James Stanley, which was revised on September 20, 1995).

IX. OSHA VERIFICATION

1. Verification Enforcement Inspections: OSHA will conduct the initial verification enforcement inspection no sooner than three months, but within four months after Partnership participants formally enter into this Agreement. During this period, Partnership participants should develop and implement the safety and health management systems required under this Agreement. After this period, OSHA will conduct the verification enforcement inspections annually thereafter. Verification enforcement inspections will be conducted as a focused inspection, per the appropriate OSHA guidelines. Compliance Safety and Health Officers (CSHOs) who are familiar with the Project will do verification enforcement inspections. Employee rights under the Occupational Safety and Health Act (OSH Act) will be afforded. During the verification enforcement inspections, if OSHA personnel identify serious hazards that site management refuses to correct, or hazards otherwise become apparent, the scope of the inspection may be expanded.
2. Complaint/Referral Investigations: This Partnership provides for the immediate response to each allegation of a safety or health hazard brought to its attention by any person. Upon a finding that an allegation is valid, the employer shall promptly abate the hazard.
3. OSHA agrees that a copy of each non-formal complaint/referral related to the work site and filed with OSHA will be forwarded by fax, or by email, to Brasfield & Gorrie - Project Management office on-site. In accordance with applicable law, the name and identifying information of a complainant requesting confidentiality will not be revealed. Holder agrees to investigate these complaints, regardless of the employer involved, and provide OSHA with a written response within 5 working days of receiving the non-formal complaint/referral.
4. Accident Investigations: Employers engaged in this Partnership recognize that OSHA fully investigates accidents involving a fatality or serious physical harm. If during the course of the investigation OSHA determines that the incident resulted from violations of the OSHA standards, the employer will not be afforded Partnership incentives.

X. WORKER AND EMPLOYER RIGHTS

This Partnership does not preclude employees and/or employers from exercising any right provided under the OSH Act, nor abrogate any responsibility to comply with rules and regulations adopted pursuant to the OSH Act.

XI. TERM OF PARTNERSHIP

It is understood that this Agreement shall be in effect until completion of construction activities at the Project, but in no case longer than three-years. Should any "signatory" stakeholder choose to withdraw prior to project completion, a written notice shall be given stating the reason(s) and providing 30 days notice to the other party(s).

If OSHA chooses to withdraw its participation in the Partnership, the entire Partnership is terminated. Any party may also propose modification or amendment of the Agreement. Changes may be implemented, if all parties agree that they are in the best interest of the Partnership.

XII. THE PROGRAM - OSPP SIGNATURE PAGE

Partnership Signing Date: _____

Joshua W. Turner
Area Director
Occupational Safety & Health
Administration (OSHA)

Kyle Schuchmann
Senior Superintendent
Brasfield & Gorrie

Isaac Ramos
Safety Manager
Brasfield & Gorrie

Josh McKinney
Regional Safety Director
Brasfield & Gorrie

Scope of Work

B&G's primary workload will consist of construction management. B&G will also be self-performing the installation of all footings and initial sheer walls. For this work, B&G Construction's project team will employ carpenters and laborers. In addition to self-performing the foundation concrete on this project, the employees will also assist in maintaining safety on the project. All site employees will be required to complete daily Crew Work Plan meetings and will be supervised by a site foreman. The superintendent and Safety Professional shall have the responsibility of enforcing safety daily. B&G will assist Subcontractors/Trade Partners with site coordination and planning. In addition to the Piedmont Henry Hospital Safety professionals, all major trades i.e. MEP, Steel, and Concrete are contractually required to provide a minimum of one full time Safety Professional. See JSSP for additional specifics.

Public Protection

During non-working hours, the jobsite gates shall be locked. No trespassing signs shall be posted in conspicuous areas on the perimeter of the project to warn the public to stay out of the site. All visitors will be required to sign-in at the B&G Field Office. B&G will be responsible for making sure all visitors are accompanied on the project and are informed of site personal protective equipment requirements.

Orientation

Site-specific orientation will be held on an as needed basis. All employees who are or will be working on site must attend this training prior to beginning work on the project. This training will encompass HammerTech safety orientation, site specific safety orientation, procedures, hazard communication, emergency planning, and basic construction safety. A site-specific orientation sticker and badge will be issued to all employees who attend this training and complete safety acknowledgment form.

Site Logistics

All haul roads will be built and maintained by site contractor (Reeves Young). Laydown areas will be provided to each subcontractor as needed. Work will only take place in the daytime unless light towers are installed to provide workers with adequate visibility. Wash out areas will be provided to concrete trucks and pump trucks in areas that will not affect traffic. B&G will manage concrete, steel, and trash dumpsters on the project.

Crane Operations

Only certified crane operators or those signed up for certification will be allowed to operate cranes on site. Only qualified riggers/flaggers will be allowed to signal the crane and rig loads to be flown. Hand signals/radios will be used to communicate with the crane operator. Whistles will be used to alert all employees in the area that a pick is being made. All loads must have a non-conductive tag line attached. For mobile cranes, the swing radius of the crane must be barricaded at all times. Outriggers must have appropriate cribbing in place prior to any loads being flown.

If a crane's working radius encompasses active power lines, one of the following must be done:

1. De-energize and ground the power lines (Must be done by the appropriate utility company)
2. Maintain a minimum 20 feet safe approach distance.
3. Determine the voltage of the lines and follow safe approach distances in SHEMS.

Personal Protective Equipment

Hard hats, high visibility vest or shirt with reflective stripes, long pants, work boots, hand protection (Gloves) are gloves worn at all times when handling materials that may cause harm to hand and safety glasses shall be worn at all times. This practice will be enforced on a daily basis as per Piedmont Henry Hospital safety policy. B&G will always monitor Subcontractors/Trade Partners PPE. Failure to wear mandatory PPE will result in verbal and written warning. If problems persist, employees may be suspended or removed from the project.

Fall Protection

All Subcontractors/Trade Partners will be required to have fall protection when exposed to a fall of 6' or greater. The Brasfield & Gorrie, LLC Team has a zero-tolerance policy on fall protection infractions. Any employee observed violating the fall protection policy will be suspended from the project for a time period to be determined by the project team. Any further infractions by that employee will result in the employee's permanent removal from the project.

Each subcontractor is required to create a plan or system to address fall protection within his or her scope of work. These plans or systems are maintained in their company's site-specific safety plans. Each company's site-specific plan is kept at the B&G office.

Guardrails and Floor Opening Protection

All guardrails, both wire rope and wooden, will be built to comply with B&G SHEMS manual. The top railing will be at 42" +/- 3" and able to withstand a downward and outward force of 200 lbs. All railings will include a mid-rail set at 21" +/- 3" and able to withstand a force of 150 lbs. All guardrails that are in locations with work or foot traffic under them shall have toe-boards installed to prevent materials and tools from falling. This toe-board will be maintained until glass or precast concrete is set on the exterior of the building rendering them unnecessary. If wire rope is used for guardrails, the wire rope must be at a minimum 3/8" diameter and flagged every 6'. The wire rope must be kept taut so it will be able to withstand a force of 200 lbs. and not sag below 39". Three clips must be installed at attachment points with 3" spacing between them.

All floor holes that are 2" or greater will be covered with plywood and marked with hi-vis paint. Any holes over 8" will be identified with the words "Hole or Cover" and "Hoyo". In the case of depressions/recesses, the area will be flagged off to warn of the depression or the edge will be painted with hi-vis paint. All covers will be secured to prevent accidental displacement. Hole covers must be made to withstand twice the weight of worker, materials, and tools. No materials can be stored around or on top of hole covers. Covers must be kept well maintained and swept

clean. Permits will be required to be submitted to respective GC/CM by the trade contractor requesting to remove a hole cover.

Roof Access

Only authorized personal will be allowed on the roof. The Roofing subcontractor will be required to tie off when building the perimeter parapet wall before roofing activities begin. Fall protection will be required unless the parapet wall meets the height requirements of a guardrail system. If the parapet wall does not meet the requirements of a guardrail system, roofers will install a warning line 6' back from the edge of the roof. This warning line is only to be used by the roofer. All other Subcontractors/Trade Partners, B&G and JE Dunn will be required to install a warning line 15' back from the roof if desired. If work is to take place beyond the warning line, a fall restraint or fall arrest system must be utilized.

Trenching and Utility Lines:

B&G and all Subcontractors/Trade Partners involved in trenching activities will be required to complete an excavation inspection/permit for all excavations or trenches that are 4' or deeper. These reports will be completed daily, after rainstorms, and after an event where conditions may change the characteristics of the trench. These are to be completed by a competent person and submitted to B&G respectively. Trenches of significant depth or trenches that are obstructed from view shall be flagged to prevent accidental injury. Trenches 4' or greater in depth will have a means of access and egress (ladder, ramp, stair, etc.). All trenches shall be guarded or sloped when at a depth of 5' or greater. In compliance with SHEMS, the B&G Team will assume all soils are type C until a soils engineer proves otherwise. Acceptable sloping for trenches or excavations 5' in depth or greater is 1.5:1. Any excavations or trenches 20' or greater in depth must have shoring/shielding system designed by a registered professional engineer.

All utilities will be located by a third party prior to any excavation or trenching activities. If utilities are present in the proposed excavation, soft digging methods must be utilized. Once utilities have been uncovered, they must be braced and protected from damage.

Safety Meetings and Training:

All Subcontractors/Trade Partners are required to attend the weekly project safety meeting. B&G Team will provide site-specific orientation to all new employees on site. Orientation and hazard awareness training will be administered on an as needed basis.

Saf

ety Professional safety walks will be held bi-weekly, and a supervisory member of each subcontractor is expected to attend. All deficiencies identified will be sent to the responsible Subcontractors/Trade Partners via emails. Subcontractors/Trade Partners are required to respond to these deficiencies in writing within 48 hours. Failure to abate deficiencies or respond in writing could delay payment.

Emergency Action Plan

Emergency Action Plan (EAP) will be posted in common areas around the project site (B&G Team trailers, job boards, break areas, etc.). The plan will be included in each employee's orientation. The EAP will be reviewed periodically during site wide safety meetings and scheduling meetings. This plan is subject to change, as the site progresses, all employees will be notified and retrained if any changes are made.