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## **Administration**

### **Purpose**

Oliver Construction Co. is committed to the health and safety of all craft workers and other employees at its project sites and offices, whether employees of Oliver Construction Co., subcontractors or others. Safety must never be compromised. Commitment to safety is part of quality workmanship and the mark of true professionals. Oliver Construction Co. strives to meet and exceed government safety standards and works to be a model on safety for the construction industry.

### **Scope**

This section applies to all Oliver Construction Co. projects and facilities.

### **Policies**

Because Oliver Construction Co. is committed to the health and safety of its employees and every trade worker associated with its projects, Oliver Construction Co. has implemented the Incident Free Program. Oliver Construction Co. believes the elimination of all injuries is possible, and Oliver Construction Co. is dedicated to achieving this goal. The success of this program depends on the commitment of all team members associated with Oliver Construction Co. projects.


Every Oliver Construction Co. team member on every project must assume responsibility for safety. Each team member has direct control over the success of Oliver Construction Co. safety program and, in turn, his or her own safety.

### **Employee Obligations**

Every employee on an Oliver Construction Co. project is obligated to:

- conduct their work in a safe manner
- stop work immediately to correct any unsafe condition that is encountered
- take corrective action so that work may proceed in a safe manner

Project teams are responsible for completing all projects safely. Oliver Construction Co. provides each project team with support from the Oliver Construction Co. Safety Department, support services to assist in raising on-site safety awareness, and safety training for team members, supervisors, managers, and subcontractors. The Safety Department performs safety observations and audits work sites and employee behaviors for adherence to Oliver Construction Co. safety policy and procedures.

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## **Oliver Construction Co. Commitment to Safety**

Oliver Construction Co. strives to constantly improve project site safety culture. Oliver Construction Co. will strive to identify and eliminate unsafe conditions and at-risk behavior to create an Incident Free environment in which no employee will work in a way that endangers life or health.

## **Accountability Policy**

### **Purpose**

All Oliver Construction Co. employees are obligated to follow stated safety policies and to report unsafe acts or conditions. Failure to do so may be cause for dismissal.

Subcontractor employees may be removed from the project site for failure to comply with Oliver Construction Co. safety policies and procedures. See Subcontractor's Safety Responsibilities, in the Incident Free Manual.

### **Scope**

This section applies to all Oliver Construction Co. projects, subcontractors, and vendors.

## **Policies**

### **Disciplinary Procedures**


If any Oliver Construction Co. employee violates company safety policy, and/or state or federal OSHA regulations, the consequences are as follows:

- First offense: Written warning
- Second offense: Two days' suspension without pay
- Third offense: Termination of employment

If an employee of a subcontractor (of any tier) violates company safety policy, and/or state or federal OSHA regulations, the consequences are as follows:

- First offense: Written warning given to subcontractor
- Second offense: The employee will not be allowed on the Project for two days
- Third offense: Oliver Construction Co. will permanently ban the employee from the Project and the Project site and may take action against subcontractor as permitted in the Subcontract Agreement

These are the minimum consequences that are enforced. Oliver Construction Co. reserves the right to remove their employees and Subcontractor employees from the project for safety violations.

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## Disciplinary Procedures for Violation of the Fall Protection Policy

**The first warning about violation of fall protection policy is given during the first day, first hour orientation.** Any subsequent violation of the fall protection policy results in a minimum two-day suspension (without pay for Oliver Construction Co. team-members). A third offense results in termination of an Oliver Construction Co. team member. For non-Oliver Construction Co. workers, a third offense results in permanent removal of the worker from the project.

## Safety Discussions

### Purpose

In support of the Incident Free philosophy, applicable meetings should start with a discussion of safety topics. Employees working together can identify and correct unsafe working conditions and behaviors.

### Scope

This section applies to all Oliver Construction Co. projects.

### Policies

For Incident Free philosophy to remain current in the minds of our work force, safety must be specifically discussed at the meetings listed below.

### Records

- The meeting leader should complete safety meeting minutes for each meeting held (if applicable).
- A copy of the completed reports should be submitted to the Safety Department.

## Toolbox Safety Meetings

**Meeting Leader:** Superintendent or foreman


**Attendees:** Crews

**Frequency:** Weekly, at a minimum (toolbox)

Copies of Toolbox sent to the main office.

Topics of toolbox discussion may include:

- review of recent incidents
- review of recent hazards
- review of the work plans for the coming week
- review of coordination issues
- review of the pertinent SDS

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Topics of stretch-and-bend discussion may include:

- review of recent incidents
- review of recent hazards

## OSHA Record Keeping

### Purpose

OSHA Form 300, the Log of Work-Related Injuries and Illnesses, is used to meet the federal recordkeeping requirements for work-related injuries and illnesses. The Safety Department can provide technical assistance on how to complete the form.

### Scope


This section applies to all Oliver Construction Co. projects.

### Policies

#### Requirements for OSHA Form 300

Each project site must keep an OSHA 300 form for the injuries that occur during the current year. At the end of the year, the Safety Department will fill out the summary report to be posted.

- The form must be kept up-to-date.
- Recordable injuries must be written on the log within seven calendar days of the Incident.
- The complete form must be retained with the project records for five years.
- Corrections of errors should be lined out and initialed.
- Use a zero if there are no entries for a column.
- Do not post the current year OSHA Form 300. Post only the summary (OSHA Form 300A, Summary of Work-Related Injuries and Illnesses) on the office posting board located in the shop. This shall be posted prior to February 1. That summary must remain posted until April 30 of the same year.
- Contact your Safety Representative to assist in determining whether or not an Incident needs to be recorded.

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## Standards, Instructions, and Examples

Illnesses and injuries are reported to OSHA on the following forms, which shall be reported by the Oliver Construction Co. Safety Department:

- Form 300, Log of Work-Related Injuries and Illnesses
- Form 300A, Summary of Work-Related Injuries and Illnesses
- Form 301, Injuries and Illnesses Incident Report

## OSHA Inspection Procedures

### Purpose

It is Oliver Construction Co. policy to fully cooperate with inspections by regulatory agencies such as the Occupational Safety and Health Administration (OSHA).

### Scope

This section applies to all Oliver Construction Co. projects.

### Policies


The following procedures Must be followed when an OSHA or another regulatory agency representative arrives at an Oliver Construction Co. project

### Notification

Notify the Safety Department as soon as the compliance officer arrives at the project site. The Safety Representative will immediately head to the project. Notify Oliver Construction Co. management that OSHA is onsite.

### Correct Any Unsafe Conditions

Look around before OSHA is walking the worksite. Fix any unsafe condition that was created by Oliver Construction Co. If Oliver Construction Co. employees are exposed to other contractor's hazard, remove workers from the hazardous area. While OSHA is onsite do not perform any high hazard work, such as working off ladders, scaffolding or where fall protection is needed.

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## Inspection Procedures

### OSHA Inspections

It is OLIVER CONSTRUCTION CO. policy to fully cooperate with inspections by regulatory agencies such as the Occupational Safety and Health Administration (OSHA).

The following procedures must be followed when an OSHA or another agency representative arrives at our project:

#### **Inspectors must be escorted.**

Instruct all OLIVER CONSTRUCTION CO. personnel to escort the inspector to the Manager. This should be done without entering the job site if at all possible. Ask to see their identification “badge” and a business card. If there are any questions about their identification contact the OSHA’s Area Office for further identification.

#### **Forms must be completed.**

Fill out OLIVER CONSTRUCTION CO. forms completely and give a copy to the Safety Department.

#### **Inspectors must be accompanied.**

Manager will accompany the inspector at all times.

#### **Be courteous.**

Extend every courtesy to make the inspector’s brief visit as pleasant as possible.

#### **Correct any unsafe conditions immediately.**

Before the inspector leaves the site, request clarification of any hazards observed and the abatement that the inspector would like to see.


#### **The inspector may talk to employees.**

If the inspector wishes to talk to employees during the walk around, he is allowed to do so by law. This talk should be limited to about five (5) minutes.

*The employee has the right to refuse to talk to the inspector. Cooperation is expected from all staff on the site.*

All employees, OLIVER CONSTRUCTION CO. and subcontractors, should cooperate with the inspection.

*Explain that OLIVER CONSTRUCTION CO., subcontractors and OSHA are conducting this inspection together, and the welfare of ALL employees is the purpose for the inspection.*

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**Inspections may be videotaped.**

Some inspectors may use a video camera. Be careful what is said when the recorder is being used.

**Pictures may be taken.**

If the inspector takes a picture, Oliver Construction Co. should take two or three to get a complete view of the hazard.

**Identify the company responsible for violations.**


If violations are alleged by the OSHA representative, identify the company responsible for or contributing to the conditions leading to the violation during the closing conference.

**Post citations conspicuously.**

Citations must be posted for three days or until the citation is abated, whichever comes first, on the job site in a place where employees pass frequently.

**Inspection Follow-up**

1. Review all proposed penalties and citations.
2. Set-up and attend the informal conference with OSHA.

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## OSHA INSPECTION REPORT

Inspection Dates and Times: \_\_\_\_\_

### 1. Pre-Inspection

a. Person and title contact by OSHA:

b. Did inspector show his credentials? Yes / No

If no, comment:

c. Names of OSHA inspectors and their area office:

d. What was the reason for the inspection:


1. Employee complaint? Yes / No

(If yes, attach copy. OSHA is required by law to provide a copy.)

2. Scheduled inspection? Yes / No

3. Other (comment):



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## 2. Opening Conference

- a. Names of contractors, their representatives and titles: (or attach list)

## 3. Inspection Tour

- a. Who from OLIVER CONSTRUCTION CO. accompanied the OSHA inspector?

Who else joined the OSHA inspection group?

- b. Did the inspector take any photographs? Yes / No

Did OLIVER CONSTRUCTION CO. take any photographs? Yes / No


- c. Were safety hazards and unsafe acts observed? Yes / No

If yes, what were they and who had responsibility?

- d. Was immediate corrective action taken? Yes / No

If no, comment:

- e. Special comments regarding inspection:

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#### 4. Closing Conference

a. Did OSHA hold closing conference w/ OLIVER CONSTRUCTION CO.? Yes / No

With other contractors? Yes / No

b. Names of contractors, their representatives and titles: (or attach list)

c. What alleged OSHA violations were discussed and with whom? (or attach list)

NOTE: At the Closing Conference, it is very important to establish which citations rightfully belong to OLIVER CONSTRUCTION CO. versus other companies. When citations are incorrectly assigned, OLIVER CONSTRUCTION CO. is forced to spend unnecessary time and money contesting them.

This OSHA Inspection Report is to be started at the beginning of and completed immediately after an OSHA inspection.