



Gulfcoast Consulting Group, Inc.

**Job Name**

**SAFETY IS PRIORITY ONE**

**1.0 INTRODUCTION**

Gulfcoast Consulting Group, Inc. (GCG) is committed to implementing the highest standards and strongest security measures at each and every one of our construction sites. And because a great percent of our projects have been situated in sensitive, occupied spaces such as hospitals, universities and corporate offices, we develop a job-specific, site utilization and safety plan to ensure the protection of our clients, employees and visitors.

We know that meticulous execution, effective communications, cohesive teamwork, and overall solid construction management are the keys to maintaining a safe, clean and secure job site.

In addition, our commitment to safety involves an in-depth safety program that provides extensive training and broad safety measures that are constantly being reviewed and evaluated. From our OSHA Certified field superintendents, mandatory, pre-planning safety training for all of our subcontractors to intense levels of site inspections, we work as a team to continually refine and strengthen our safety performance as a company.

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### **3.0 OBJECTIVE**

This program has been designed to provide consistent information about the minimum GCG requirements for safety in construction areas.

### **4.0 APPLICABILITY**

Construction activities pose a danger to the health and safety of not only contractors and their employees working on the jobsite, but to all facility employees working in, adjacent to, or in buildings in which construction activities are taking place.

It is the responsibility of all facility departments, contractors, vendors and staff to participate in, and comply with, all components of a Safety Program, including the

Construction Safety Program in place by GCG. GCG is responsible for administering the program and ensuring its compliance.

This program applies to all construction and renovation projects and is not intended to be all inclusive. It is merely a guide to outline some of the important concerns of GCG and the facility, and protocols that must be followed by all contractors when working at any and all facilities under contract by GCG.

All contractors are expected to comply with all federal, state and local laws, codes and standards. They should incorporate best practices into their daily operation and maintain a clean and orderly worksite at all times.

## **5.0 GENERAL SAFETY PRACTICES**

It is the policy of GCG to comply with all OSHA standards including the general duty clause. We expect all contractors, sub-contractors, and their employees to comply with these regulations, and it is our responsibility as the general contractor to enforce these standards and practices. GCG has a designated qualified employee who is the Site Safety Officer. The Safety Officer will be the on-site contact person responsible for compliance with the GCG Construction Safety Program.

All contractors, sub-contractors and their employees are responsible for monitoring and enforcing compliance with all elements of the construction safety program. GCG is vested with the authority to intervene when construction activities cause conditions that pose a danger to the health and safety of workers, facility staff, visitors and the general public, or damage to facility property. During monitoring activities when non-compliance issues are identified, GCG staff will take all necessary steps to ensure that all violations are immediately corrected.

Gross violations of the construction safety program, including activities or behavior that is considered immediately dangerous to life and health, or repeat violations will result in the cessation of construction activities and the permanent removal of the offending contractor or worker(s).

### **5.1 GENERAL GUIDELINES:**

1. The job site must remain secured at all times and protected against the entry of any unauthorized personnel.
2. Anyone entering the construction site should be wearing head protection until the point when all overhead work is completed and GCG has provided written approval as such.
3. All employees working on the site must use appropriate personal protective equipment including eye protection.
4. GCG prohibits dropping material or debris from a building without the use of appropriate equipment.

### **5.2 INDOOR AIR QUALITY GUIDELINES:**

1. The job site must be properly separated from adjacent areas and precautions taken to keep construction dust and dirt from migrating outside the work site.

2. All doorways, plenums, and penetrations will be sealed to mitigate the migration of dust and other particulates from the work site.
3. The work site will be well ventilated to provide sufficient air exchanges and fresh air supply.

### 5.3 HAZARDOUS MATERIAL GUIDELINES:

1. If hazardous materials are being used on the work site, GCG will provide the Facilities Manager with all applicable Material Safety Data Sheets (MSDS's) prior to the materials' arrival.
2. At no time will the storage of flammable liquids be allowed on the work site.

### 5.4 DEMOLITION GUIDELINES: When performing work at a location that is located adjoining an occupied area, and demo work is being performed using jack hammers, chipping guns or other tools that cause vibration or impact on the lower floor, an initial evaluation needs to be performed by the contractor as follows:

1. A worker must be dispatched to the occupied area to evaluate noise and vibration and the impact on the occupants in the immediate surroundings.
2. Confirm that the noise and vibration level is tolerable for the occupants and whenever possible mitigate the impact by the following methods:
  - Always choose the lowest impact tool available that will still effectively perform the task.
  - Work intermittently, taking periodic breaks to alleviate continuous noise and vibration.
  - When breaking up a slab, angle the tool to the surface and make fissures in the material avoiding positioning the tool perpendicular to the work.

### 5.5 ELECTRICAL GUIDELINES:

1. All temporary electric must be installed as specified by OSHA 1926.402 (a).
2. Temporary electric circuits shall be tested and color coded.
3. All power hand tools and extension cords connected to temporary electricity are required to be GFCI protected.
4. Electric power tools and extension cords that are not in good repair must be removed from service.

## 6.0 PRE-DEMOLITION

- 6.1 GENERAL DEMOLITION Prior to permitting the start of demolition operations, an observation must be made, by the GCG Project Manager, to determine the condition of the framing, floors, and walls, and possibility of unplanned issues in any portion of the structure. Any adjacent structure where employees may be exposed must also be similarly checked. The finding will be presented to the Facilities Representative.

## 7.0 PERSONAL PROTECTIVE EQUIPMENT

Personal protective equipment (PPE) is used to increase individual safety while performing potentially hazardous tasks. PPE may include safety glasses, hard hats, gloves, respirators, or any equipment or clothing used to protect against injury or illness. Contractors must ensure that the proper types of PPE are available and used by employees.

At a minimum, contractors must wear:

- **Safety glasses** with side shields to protect against flying particles (e.g., saw dust, nails, metal shavings, etc.). Goggles should be used to protect against molten metal, liquid chemicals, acids and caustic liquids, chemical gases and vapors. Shaded eyewear should be used to protect against potentially injurious light radiation (e.g., cutting and welding, lasers).
- **Hard hats** must be worn at all times during a construction project until the finished ceiling or equivalent has been installed. All workers in areas where there is a possible danger of head injury from impact, from falling or flying objects, or from electrical shock and burns must also be protected by a hardhat.
- **Footwear:** Leather work shoes are required. Sneakers are not permitted. Protective footwear (e.g., steel toe boots, reinforced soles, insulated, etc.) must be worn in areas where there is the potential for foot injuries from falling or rolling objects, from objects piercing the sole, or from exposed energized electrical conductors that could contact the feet.
- **Clothing:** Pants must be worn while at a construction site. Shorts are not permitted.
- **Hand protection:** Proper hand protection (e.g., leather work gloves, welder's gloves, appropriate chemical protective gloves, etc.) to protect against cuts or lacerations, abrasions, punctures, hazards of skin absorption of harmful substances, chemical burns, thermal burns, or harmful temperature extremes must be worn.
- **Hearing protection** must be worn on the job site when noise levels exceed the permissible exposure limit defined by the Occupational Safety and Health Administration pursuant to requirements outlined in OSHA 1910.95.

## 8.0 SMOKING

Smoking is prohibited in all facilities under contract by GCG (including rooftops) during ALL phases of construction projects. Workers found smoking may be removed from the work site at the discretion of GCG.

## 9.0 HOT WORK

Hot Work is defined as welding, cutting, soldering, brazing, grinding, and other forms of torch operations that will introduce sparks or open flame to a work area. Potential health, safety, and property hazards result from the fumes, gases, dust, sparks, hot metal and radiant energy produced during hot work operations.

All contractors that intend to perform hot work activities at the facility must present a detailed Hot Work Safety Program to GCG for approval by the Safety Officer prior to commencing work. All hot work will comply with all applicable Federal, State and Local regulations and national codes and standards.

1. The work area must be swept clean and free of all combustible material within 30 feet of the worksite.
2. A Fire Watch will be posted at the worksite and in all areas outside of plain site of the operator where heat can be conducted or sparks have the potential for penetration.
4. The fireguard(s) must be equipped with adequate and appropriate fire extinguishing appliances.
5. All combustible material that cannot be removed must be covered and shielded from heat using any approved method including ceramic shields and heat sinks.
6. If and when required, the operator will be in possession of a valid Certificate of Fitness or other license or proof of qualification issued by the authority having jurisdiction.

## **10.0 PAINTING/FLOOR COATING**

All painting (other than the use of water-based paint), varnishing, sealing, coating, etc. must be coordinated with the Facility Representative to ensure that surrounding areas are not affected by the work.

All flammable products must be stored in an OSHA approved flammable storage cabinet.

All finishes must meet the minimum OSHA requirements for flame spread and smoke development ratings.

## **11.0 LADDERS**

The chief hazard when using a ladder is falling. Proper use of ladders is essential in preventing accidents. Even a good ladder can be a serious safety hazard when used by workers in a dangerous way.

Types of ladders:

- Portable stepladders longer than 20 feet are not allowed. The top of a regular stepladder is not to be used as a step.
- Single ladders must not be longer than 30 feet.
- Extension ladders must not be longer than 60 feet.

At a minimum, the following safety precautions for ladder use must be followed:

- Ladders must be inspected frequently. Those that have developed defects must be immediately tagged or marked (Dangerous, Do Not Use), **and** be removed from service for repair or destruction.
- Ladders must be placed on secure footing, and an even surface when possible, or they must be tied off at the top, middle, and bottom to prevent slipping.

- Ladders used to gain access to a roof or other area must extend at least three feet above the roof in order to provide a point of support when stepping on the roof.
- The worker will always face the ladder when climbing up or down. The worker must have at least one hand and two feet or two hands and foot on the ladder at all times to maintain 3-point climbing.
- Short ladders must not be spliced together to make long ladders.
- Ladders must not be used in the horizontal position as scaffolds or work platforms.
- Metal ladders must never be used near electrical equipment.

## **12.0 SCAFFOLDING AND OTHER WORK PLATFORMS**

- Provide safe access to get on and off scaffolds and work platforms safely. Use ladders safely
- Keep scaffolds and work platforms free of debris. Keep tools and materials as neat as possible on scaffolds and platforms. These practices will help prevent materials from falling and workers from tripping.
- Erect scaffolds on firm and level foundations.
- Finished floors will normally support the load for a scaffold or work platform and provide a stable base.
- Place scaffold legs on firm footing and secure from movement or tipping, especially surfaces on dirt or similar surfaces.
- Erect and dismantle scaffolds only under the supervision of a competent person.
- Each scaffold must be capable of supporting its own weight and 4 times the maximum intended load.
- The competent person must inspect scaffolds before each use.
- Use manufactured base plates or mud sills made of hardwood or equivalent to level or stabilize the footings. Don't use blocks, bricks, or pieces of lumber.
- Fully plank a scaffold to provide a full work platform or use manufactured decking. The platform decking and/or scaffold planks must be scaffold grade and must not have any visible defects.
- Keep the front edge of the platform within 14 inches of the face of the work.
- Extend planks or decking material at least 6 inches over the edges or cleat them to prevent movement.
- The work platform or planks must not extend more than 12 inches beyond the end supports to prevent tipping when workers are stepping or working.
- Be sure that manufactured scaffold planks are the proper size and that the end hooks are attached to the scaffold frame.

### **Scaffold Guardrails**

- Guard scaffold platforms that are more than 10 feet above the ground or floor surface with a standard guardrail. If guardrails are not practical, use other fall protection devices such as safety harnesses and lanyards.
- Place the toprail approximately 42 inches above the work platform or planking with a midrail about half that high at 21 inches.
- Install toe boards when other workers are below the scaffold.

## 13.0 FALL PROTECTION

Fall protection is a combination of methods and devices used to protect workers from falling off, onto, or through working levels. Fall protection also includes methods and devices that protect workers from being struck by falling objects. Examples of fall protection include rails, guards, guardrails, barriers, hole covers, fall arrest systems, positioning device systems, safety nets, and various work practices and procedures.

Fall protection must be implemented when work is performed on elevated surfaces that are **six feet or more** above the surrounding area. Fall arresting systems, which include lifelines, body harnesses, and other associated equipment, are often used when railings, floors, nets, and other means cannot control fall hazards.

The Site Safety Officer must analyze the work site, the potential hazards and the magnitude of possible injury to workers in assessing which type of fall protection system should be used.

## 14.0 EXCAVATIONS AND TRENCHING

### General

- Find the location of all underground utilities by contacting the local utility locating service before digging.
- Keep workers away from digging equipment and never allow workers in an excavation when equipment is in use.
- Keep workers from getting between equipment in use and other obstacles and machinery that can cause crushing hazards.
- Keep equipment and the excavated dirt (spoils pile) back 2 feet from the edge of the excavation
- Have a competent person conduct daily inspections and correct any hazards before workers enter a trench or excavation.
- Provide workers a way to get into and out of a trench or excavation such as ladders and ramps. They must be within 25 feet of the worker.
- For excavations and utility trenches over 5 feet deep, use shoring, shields (trench boxes), benching, or slope back the sides. Unless soil analysis has been completed, the earth's slope must be at least 1½ feet horizontal to 1 vertical (Figure 18).
- Keep water out of trenches with a pump or drainage system, and inspect the area for soil movement and potential cave-ins.
- Keep drivers in the cab and workers away from dump trucks when dirt and other debris are being loaded into them. Don't allow workers under any load and train them to stay clear of the backs of vehicles.

## **15.0 CONFINED SPACES**

A confined space as any space that is large enough and so configured that an employee can bodily enter and perform assigned work, that has a restricted means of entry or exit, and that is not designed for continuous employee occupancy.

Permit-required confined space is a confined space that has one of the following characteristics:

- Hazardous atmosphere or potential to produce a hazardous atmosphere
- Engulfment hazard by a flowable material
- Inwardly converging walls or a floor that tapers to a smaller cross-section so that an entrant could be trapped or asphyxiated
- Equipment or stored energy hazards such as electrical current, hydraulic operators, or steam lines
- Other serious safety or health hazards

## **16.0 ENERGY CONTROL (LOCKOUT/TAGOUT)**

Energy control (Lockout/Tagout) is a program intended to prevent the unexpected energizing or the release of stored energy in machines or equipment on which servicing and maintenance is being performed by employees.

Outside personnel or contractors involved in service, maintenance, or construction operations must submit their Lockout/Tagout Program to GCG prior to work activities. GCG will submit Lockout/Tagout procedures to the facility representative before work activities begin for prior review.

## **17.0 BARRICADES AND FENCING**

Barricades act as warning devices alerting others of the hazards created by construction activities. They should be used to control traffic, both vehicular and pedestrian, safely through or around the work site. Contractors must use barricades wherever necessary for the physical protection of people or property.

Temporary fencing, plastic safety fencing and portable manhole barricades are examples of acceptable barricading. Yellow caution tape and/or cones are not considered acceptable barricades, and should be used only until more suitable barricades can be erected. Signage and/or illumination should be used where appropriate.

At a minimum, contractors must barricade the following areas:

- Areas with temporary wiring operating at more than 600 volts
- Work areas for electrical equipment with exposed, energized parts
- The swing radius of the rotating superstructure
- Temporary wall or floor openings

## 18.0 ACCESS TO CONSTRUCTION AREAS

Access into construction areas must be limited to authorized personnel only. The following rules must be followed at all times:

- Doors into construction areas must be kept in the closed position at all times (unless in use).
- Construction projects that open onto a common public corridor must be secured at all times.
- Once the space is given over to the contractor, all entrances must be immediately secured by the contractor and all facility personnel **MUST** have prior permission from the facility representative and GCG to enter the space
- **Stairwell Doors:** all stairwell doors must remain fully closed at all times (except when using the door for entry or exit).
- **Security:** doors that would normally be locked must not be chocked in the open position. Security must be maintained at all times.
- **Children:** children are not permitted in any construction site or area at any time.
- **Fire Stopping:** fire stopping must be maintained at all times during a construction project.

## 19.0 ADA ACCESS

Access to handicap entrances must be maintained at all times during the course of a project. Alternative routes must be designated prior to the beginning of the project. A contingency plan must be completed if routes have to be altered.

## 20.0 MOBILE EQUIPMENT

- Train workers to stay clear of backing and turning vehicles and equipment with rotating cabs.
- Be sure that all off-road equipment used on site is equipped with rollover protection
- Maintain back-up alarms for equipment with limited rear view or use someone to help guide them back.
- Be sure that all vehicles have fully operational braking systems and brake lights.
- Use seat belts when transporting workers in motor and construction vehicles.
- Maintain at least a 10-foot clearance from overhead power lines when operating equipment.
- Block up the raised bed when inspecting or repairing dump trucks.
- Know the rated capacity of the crane and use accordingly.
- Ensure the stability of the crane.
- Use a tag line to control materials moved by a crane.
- Verify experience or provide training to crane and heavy equipment operators.

## 21.0 FIRE PREVENTION

- Provide fire extinguishers near all welding, soldering, or other sources of ignition.
- Keep fire extinguishers easy to see and reach in case of an emergency.

- Provide one fire extinguisher within 100 feet of employees for each 3,000 square feet of building (Figure 23).
- Don't store flammable or combustible materials in areas used for stairways or exists.
- Avoid spraying of paint, solvents, or other types of flammable materials in rooms with poor ventilation. Build-up of fumes and vapors can cause explosions or fires.
- Store gasoline and other flammable liquids in a safety can outdoors or in an approved storage facility (Figure 24).
- Don't store LP gas tanks inside buildings.
- Keep temporary heaters at least 6 feet away from any LP gas container.
- Ensure that leaks or spills of flammable or combustible materials are cleaned up promptly

## 22.0 CHEMICAL HAZARD COMMUNICATION

All sub-contractors must comply with the GCG Hazard Communication Program and review the program prior to commencing work.

Contractors are required to:

- Take all necessary precautions to protect facility employees, contractors, and visitors from exposure to chemicals.
- Maintain MSDS's **on-site** and have readily accessible for all hazardous chemicals used or stored at the job site.
- Maintain an inventory of all hazardous chemicals used on the job site.
- Clean up any spills created or caused. Sub-Contractors must alert GCG immediately upon discovering a spill.

## 23.0 GASOLINE POWERED EQUIPMENT

Fire Code and OSHA prohibits the use or storage of gasoline, or gasoline powered equipment within any enclosed building.

## 24.0 ENVIRONMENTAL SAFETY

At no time will a contractor be allowed to create a life safety hazard such as:

- Blocking exit access, egress or exit discharge.
- Wedge open fire or smoke doors.
- Remove or modify exit signage or emergency lighting.
- Remove fire extinguishers, smoke detectors or any other signaling device or any fire suppression equipment without the prior knowledge and authorization of the facility representative.
- At no time will a contractor compromise the fire rating of a partition, door, or other barrier to smoke and fire spread.
- At no time will a contractor leave supplies, materials, tools, equipment, ladders, ropes, scaffolding or other objects in public or common areas, outside the work site, unattended for any length of time.

Contractors must insure that:

- All construction will be compliant with OSHA regulations including the fire stopping of penetrations through smoke and fire partitions.
- All contractors will protect walls, floors and other surfaces from damage while moving equipment, materials, debris or other objects.
  - o Floors will be protected with either contractor paper or appropriate materials and will be so arranged to provide a smooth even walking surface free from any slip, trip or fall hazards.
  - o Edges will be feathered to provide an even surface with the existing floor.
- When working in public areas, cordon off the work area using caution tape with an appropriate number of caution signs placed conspicuously in order to alert the public that the area is off limits to unauthorized personnel.
- All doors leading into and out of any worksite shall be secured to prevent access by unauthorized individuals.

## **25.0 INCIDENT REPORTING**

Although GCG is responsible for maintaining the OSHA 300 log, any incident involving an occupationally related illness or injury occurring on the jobsite will be reported to the Facility Representative immediately. Copies of any incident report, interview or any other related documentation will be provided to the Facility Representative which will trigger an independent investigation by GCG.

If it is determined at the conclusion of this investigation that the incident may have been caused by the negligence of the contractor then the contractor may be subject to disciplinary action by GCG or potentially being removed from the approved contractor list, barring the contractor from bidding or participating on any future projects.

## **26.0 OPERATIONAL IMPACT / TRANSPORT OF MATERIALS AND SUPPLIES**

26.1 VERTICAL TRANSPORTATION A schedule will be developed during the planning stages of the project to provide for the vertical transport of materials and equipment from the receiving area or entrance to the building, to the jobsite. At no time will a contractor attempt to transport materials and equipment without the prior knowledge and consent of the project manager or facility staff. Any contractor, sub-contractor or their employees found violating this policy will be inserved and potentially reprimanded and / or disciplinary action may be taken against them.

### **26.2 ELEVATORS**

In buildings where there are service elevators, all contractors and their employees must use **ONLY** the service elevators. At no time will the use of other elevators be permissible for use by contractors, except under special or extreme circumstances. In buildings where there are no service elevators, contractors and their employees should always yield the right of way to passengers.

At no time should any tools, supplies or materials be transported on a passenger elevator when there are other passengers using the elevator. All passenger elevators shall be protected by covering and taping the floor with

contractor paper and when necessary, by covering the walls with padding. Paper should be changed periodically when necessary but no less than once a week.

All areas leading to and from the elevator to the jobsite will be protected from damage to floors and walls. These areas must remain clean and free of debris. Materials and equipment deliveries will be scheduled at times arranged to be the least intrusive and obstructive to building operations and occupant movement. The removal of debris and waste should be scheduled after at the close of business for the facility if possible.

## **27.0 HOUSEKEEPING**

Contractors must comply with the following housekeeping regulations:

- Maintain the jobsite in a clean, uncluttered and organized condition free of the accumulation of unnecessary combustible material.
- Floor surfaces and corridors will remain free of any slip, trip and fall hazards and exits maintained clear and unobstructed.
- Areas leading to and from the jobsite will be protected from damage and remain clean on a daily basis.
- Contractors and their employees will not be allowed to walk through occupied areas of the building wearing dirty clothing and work shoes.
- Transport should be directly to and from the jobsite, preferably through the receiving area if the building has a receiving area / loading dock.
- Debris will be removed from the jobsite on a daily basis especially during demolition operations.
- Tack mats shall be placed at all entrances to every jobsite to remove dust and dirt from work shoes and reduce the amount of dirt being brought through occupied areas.

## **28.0 WASTE GENERATION**

24.1 NON-HAZARDOUS WASTE Contractors are responsible for the disposal of all non-hazardous construction waste.

### 24.2 HAZARDOUS WASTE

All hazardous waste, as defined by the Environmental Protection Agency (EPA), will be reviewed on a case by case basis to determine whether the contractor or GCG will handle, prepare for shipment, and dispose of hazardous waste. All contractors are required to comply with all laws governing the protection of the environment and proper handling, transporting and disposal of all regular and hazardous waste. All contractors are required to maintain all applicable permits and licenses required by federal, state and local laws governing the collection, packaging, transportation and disposal of all regular and hazardous waste. The contractor is responsible for immediately contacting the facility representative whenever during the course of work, the contractor comes in contact with any hazardous material on the job site. The contractor shall not handle the material until it is evaluated by the facility.

## **29.0 TEMPORARY PARTITIONS**

The following guidelines should be followed when constructing temporary partitions:

- Temporary partitions isolating the construction site will be constructed having a fire rating of one hour.
- Doors leading into the worksite shall be self-closing and positive latching using a slam lock or other locking mechanism that will remain locked at all times. Access to the construction site therefore will be accomplished by using a key. This precaution is necessary to prevent unauthorized individuals from entering the construction site.
- Signs will be conspicuously posted on each door entrance on the occupant side reading "Construction Area – Hardhats Required Authorized Personnel Only."
- Keys to the worksite will be provided to Facilities Management and GCG.

## **30.0 EMERGENCY TELEPHONE NUMBERS**

Contractors are responsible for addressing any emergency repairs and providing emergency response for issues that arise as a result of work being performed by the contractor on the job site during business and off-hours. Consequently, all contractors **MUST** post an accurate list of all emergency contact information, including availability and multiple contact telephone numbers. This is critical to ensure that at any time day or night that a responsible person can be contacted to address any type of emergency that may arise.

The emergency contact list **MUST** be permanently affixed, using durable material, on the occupant side of each entrance to the jobsite. A copy of the list must also be submitted to the facility representative prior to the commencement of work.

## **31.0 REFERENCES**

Hazard Communication 29 CFR 1910.12

Lock Out / Tag Out 29 CFR 1910.147,333

Occupational Noise Exposure 29 CFR 1910.95

Construction Industry Standard 29 CFR 1926

General Duty 29 USC 654, OSH 70 Section 5

Personal Protective Equipment 29 CFR 1910.132-138

Recordkeeping 29 CFR 1904.39

Cutting, Welding and Brazing 29 CFR 1910.251-255

Walking-Working Surfaces 29 CFR 1910.22-30

NFPA 101 Life Safety Code

Smoke Free Air Act

Bureau of Fire Prevention