**Siding Contractor**

**Safety & Health Program**

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Contributed By

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**fOR INFORMATION CONTACT**

National Association of Home Builders

Labor, Safety & Health Policy Department

1201 15th St. NW | Washington, DC 20005

Toll free: 1-800-368-5242, ext. 8507

[nahb.org/safety](http://www.nahb.org/safety)

**About NAHB**

The National Association of Home Builders (NAHB) helps its members build communities. Each year, NAHB members construct about 80% of the new homes built in the United States, both single-family and multifamily. A federation of more than 700 state and local associations, NAHB represents more than 140,000 members. About one-third are home builders and remodelers. The rest work in closely related specialties such as sales and marketing, housing finance, and manufacturing and supplying building materials.

**Safety 365**

NAHB has created a member and public awareness campaign to provide information and resources to help keep construction workers safe and eliminate preventable accidents, injuries, and deaths, with the focus on supporting construction safety every day--365 days a year: #safety365. The campaign with align with NAHB’s current educational resources, safety training materials, and news updates that are intended to help educate employers and workers on the various safety and health hazards the industry faces on the jobsite, and to better understand and comply with Occupational Safety and Health Administration (OSHA) requirements.

**About James hardie**

As the industry leader, James Hardie views safety for everyone as a top priority. According to Sean Gadd, CMO and EVP of Segments & Products, “Investing in safety is a critical component of our company. Understanding our shared values, James Hardie is pleased to partner with the NAHB to become the Diamond Sponsor Level of Safety.” The company launched a Zero Harm initiative in 2016 to focus on safety: people, places and systems. And this extends to customers. “It goes beyond building great quality products at James Hardie,” notes Gadd. “We don’t just protect homes; we strive to help protect the people who build them and live in them.” James Hardie website address is: [jameshardie.com](http://www.jameshardie.com).

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**About SFI Complaince**

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SFI has over 100 years of workplace safety and risk management experience, industry recognition for excellence, extensive bilingual capabilities, and advanced certifications. Turn to SFI consultants for expert services in OSHA compliance, risk management, on-site safety evaluations, safety policy management, review and preparation, and safety training. SFI offers Complete Safety Management™ services nationwide.

Local Commitment, National Presence

COLORADO | TEXAS | ARIZONA | GEORGIA | FLORIDA

Visit their website at: [www.sficompliance.com](http://www.sficompliance.com)

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**Instructions – How to use this program**

The SIDING CONTRACTOR SAFETY & HEALTH PROGRAM is a model company safety program ***ONLY*** for establishments primarily engaged in installing siding of fiber cement, wood, aluminum, vinyl, or other exterior finish material (excluding brick, stone, stucco, or curtain wall) on residential buildings and is intended to cover ***their employees only***. It contains the materials needed to effortlessly set up a safety program for your company. It is intended to be used by management, who can take the safety program and provide it to each jobsite so that each site (or superintendent, if applicable) will have a site-specific program.

The SIDING CONTRACTOR SAFETY & HEALTH PROGRAM is designed with small companies in mind. It is intended as a practical, hands-on guide for implementing an effective safety program without hiring an additional employee or consultant to develop it.

There are places in the SIDING CONTRACTOR SAFETY & HEALTH PROGRAM that are highlighted in **BLUE** in which companies should input their company specific information. It is intended for management (or the superintendent, if applicable) to fill out the information prior to starting the job. Be sure to insert your company’s name and the name of any company personnel in the appropriate places highlighted.

The SIDING CONTRACTOR SAFETY & HEALTH PROGRAM is made up of five (5) sections: Roles & Responsibilities; Hazard Identification & Assessment; Safe Work Practices; Accountability; and Incident Response. **START** with the “Start-up Checklist” that walks siding contractors and superintendents through each of the sections when starting up a new program.

Siding contractors can **print out pages** **6 through 49** of this document, which make up the SIDING CONTRACTOR SAFETY & HEALTH PROGRAM and use the cover page, table of contents, 3-ring binder divider tabs to separate each section and insert it into a 3-ring binder.

In addition to the SIDING CONTRACTOR SAFETY & HEALTH PROGRAM, ***forms*** are provided that could be used on the site, by the office, or posted near the working area. Siding contractors can also use these forms that should be filled out, returned, and then filed in the 3-ring binder.

Siding contractors are encouraged to reproduce this program, or any portion(s) of it, for use in their own companies. *NOTE: this SAFETY & HEALTH PROGRAM is meant to be adaptable—not all the information is necessarily applicable to every construction project.*

More information is available at [nahb.org/safety](http://www.nahb.org/safety).

**Siding Contractor Safety & Health Program**

**Company Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Jobsite: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

This safety and health program is for our company employees only. Each employer must develop, implement, follow, and enforce their own safety and health program, including providing the proper competent person(s) for the specific task for which they are responsible.

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**Siding Contractor Safety & Health Program**

**Start-up Checklist**

Management should use this checklist when implementing the SIDING CONTRACTOR SAFETY & HEALTH PROGRAM and when evaluating the program. When a task is complete, please date and initial the appropriate column.

|  |  |  |
| --- | --- | --- |
| **Review each section of your safety program, review with employees and fill out appropriately:** | **Date Complete** | **Initials** |
| * **Section 1:** A company executive should sign the Commitment to Safety & Health found on page 1.1. Management should review and understand the Safety & Health Policies and Procedures. This section shall be reviewed with all supervisors and employees to emphasize each employees’ roles and responsibilities relating to jobsite safety and health. Determine the frequency you will require your supervisors to conduct tool box talks and safety meetings and fill that out on page 1.2 and 1.3 respectively. Each employee of the company should review the safety health program and then sign the EMPLOYEE COMMITMENT TO SAFETY & HEALTH, page 1.7.
 |  |  |
| * **Section 2:** Conduct an initial assessment of existing hazards, exposures, and control measures prior to work commencing and to be followed by periodic inspections and reassessments, to identify new hazards. Identified hazards are prioritized for corrective measures and control.
 |  |  |
| * **Section 3:** Identify and select methods for eliminating, preventing, or controlling workplace hazards, including engineering solutions and using the appropriate safe work practices, administrative controls, and Personal Protective Equipment (PPE).
 |  |  |
| * **Section 4:** Review and understand company enforcement policy and how violations of the safety and health program will be handled as well as management of subcontractor compliance with this safety program and applicable safety and health regulations.
 |  |  |
| * **Section 5:** Review and understand the basic emergency action plan to prepare for an evacuation and the procedures to investigate any incident that occurs on the jobsite including injuries to any employees or property damage. A more specific plan can be developed for each jobsite based on location and specific hazards/risks.
 |  |  |
| * **Forms:** There are additional resources available at nahb.org/sidingsafety to help keep your jobsite safe, which includes various forms, such as a Safety Inspection Checklist, Scaffold Inspection Form, OSHA Recordkeeping Forms, and Incident Investigation Forms, as well as OSHA compliance assistance resources on topics such as Scaffolding, Ladder Safety, Fall Prevention Silica Fiber Cement Board, Nail Gun Safety, and OSHA Posters.
 |  |  |

Checklist filled out by (Print Name): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Commitment to Safety & Health**

As a siding contractor, it is our company’s policy to perform work in the safest manner possible, consistent with industry safe work practices, and according to all governing laws and regulations. The safety and health of our employees, subcontractors and others who may be in our work areas is paramount. This program has total management support. Managers at every level are charged with the task of translating this policy into positive and productive action.

This Safety & Health Program, as revised from time to time, contains company safety and health procedures for the jobsite. These procedures represent a wealth of practical experience, and they have been tested on many successful projects. Putting these procedures to work can protect the well-being of our employees; preserve vital company resources; and minimize financial losses caused by accidents. It is a requirement that all subcontractors develop, implement, and follow, and enforce their own safety and health program, including providing a proper competent person. Therefore, as a condition of employment by the company each employee is required to study, understand, and abide by these procedures. This Safety & Health Program is provided for the sole purpose of improving safety and health conditions in our company and is NOT to be considered as an agreement or contract for employment.

This Safety & Health Program follows OSHA Recommended Practices for Safety and Health Programs, which provide for the prevention of jobsite injuries and illnesses, improved compliance with laws and regulations, reduction of costs, including significant reductions in workers' compensation premiums, engagement of workers, enhancement of company social responsibility goals and increasing productivity and enhance overall business operations.

Our Safety & Health Program provides ways to systematically identify, evaluate, and prevent or control jobsite hazards, specific task hazards and other hazards which could arise from operations. This Safety & Health Program is not a one-time plan but is a dynamic program that is always open to improvement.

Safety is as critical to our company's operations as production and quality. Further, we believe that accidents are preventable, and that it is up to each of us to ensure that we practice safety as a routine part of our daily work. One of our safety goals is to have the best safety and health conditions possible in the jobsite. To achieve that goal, we must first have a good attitude about safety. Then we must THINK SAFETY and WORK SAFELY.

 Sincerely,

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 **Signature of Company Executive**

**Management Leadership**

The personal safety and health of each employee of this company is of primary importance. The prevention of occupational injuries and illness is so important that it is to have precedence over operating productivity whenever necessary. The company will, to the greatest degree possible, provide safe mechanical and physical jobsites, provide for employee safety training and implement safe work practices that will make our work areas safe places to work. The company is committed to a safety and health program that will reduce the number of injuries and illness to a minimum, not merely in keeping with, but hopefully surpassing, the best experience of similar industry operations.

Supervisors are accountable to company management for the successful achievement of our safety and health goals. Our safety and health goals are as follows:

1. Provide the best safety and health conditions possible on the jobsite.
2. Minimize all injury accidents and health impairment.
3. Prevent any major fires, vehicle accidents or property damage losses.
4. Zero permanent disabilities.
5. Zero fatalities.
6. Limit environmental impact and public exposure/harm.

These goals are implemented to control and prevent failures which cause fatalities, injuries, illness, equipment damage, fire, and damage or destruction to property.

No phase of our company's operations is more important than accident prevention. Each employee is expected to be aware of and actively pursue safety goals. There is only one way to do a job properly - THE SAFE WAY!

**SUPERVISOR RESPONSIBILITY**

Unless notified otherwise, the supervisor of each jobsite is responsible for the implementation of our Safety & Health Program at each jobsite he or she supervises.

**General Safety and Health Responsibilities:**

* Set the example for good safety and health practices and follow responsibilities as an employee.
* Conduct an employee Safety Orientation whenever a new employee comes onto the jobsite.
* Prepare for and provide jobsite Tool Box safety meetings, with rules and regulations for the site. These Tool Box safety meetings shall occur \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.
* Train employees under his or her supervision about the provisions of this Safety & Health Program. This includes jobsite hazards, safe working procedures and policies, how working safely can prevent accidents, and how one can avoid injury and prevent property damage.
* Continually monitor the safety and health performance of employees and subcontractors, including prompt correction of hazards. Prepare written warnings and reprimands for violations of this Safety & Health Program.
* Monitor the status of jobsite safety and health, by personally conducting jobsite safety inspections and by directing corrective action. These jobsite safety inspections need to be formally documented on a \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ basis.
* Assure the availability of required safety equipment and personal protective equipment needed for the work being done, giving special attention to non-routine tasks.
* Ensure PPE and safety equipment is inspected and in proper working condition.
* Cooperate with other employers and subcontractors to improve overall safety and health conditions.
* Investigate and document accidents and losses immediately, analyze the causes, and prepare recommendations to prevent similar accidents in the future. Prepare reports for worker’s compensation, employee reprimands or disciplinary action immediately following an incident. This should be completed within 24 hours of the accident or incident.
* Conduct a post incident safety meeting with employees to discuss the incident and review causal factors and root cause analysis to prevent similar accidents in the future.
* In the event of a serious accident or a government safety inspection, notify management ASAP.
* Be familiar with the OSHA Standards for the Construction Industry and be able to find information in OSHA Standards when necessary. These are available at [www.osha.gov](http://www.osha.gov). If you work in a state with their own state OSHA plan and regulations, be familiar with those as well.

**Hazard Communication Responsibilities:**

* Maintain a Hazard Communication Plan for each jobsite supervised.
* Conduct Hazardous Chemical Inventories and ensure availability of Safety Data Sheets (SDS).
* Verify that chemical labeling is properly done. Maintain a supply of labels and other hazard warnings.
* During the employee Safety Orientation, make sure employees know where to find the Hazard Communication Plan, explain labels and other hazard warnings and the Chemical Inventory List and teach him or her how to read a SDS.
* Train all employees under his or her supervision as required by the Hazard Communication Plan, including the employee’s Right to Know. Prepare a Training Report for each hazardous chemical training completed, which certifies by each employee's signature, the training received. Keep the training record on file in this Safety & Health Program.
* Coordinate hazard communication with other employers, such as other subcontractors on a company jobsite as needed to protect company employees from the hazards specific to the site and potential exposure.
* Direct the proper cleanup of any hazardous chemical spill, prepare required reports and notify management.

**MANAGEMENT RESPONSIBILITY**

Management is responsible to provide direction, motivation and accountability to ensure a dynamic safety and health program for all company jobsites. Specific responsibilities include:

* Set the example for good safety and health practices.
* Establish annual safety goals and objectives.
* Establish an adequate budget to fund the safety and health program.
* Ensure competent persons are assigned to tasks required for such activities such as silica exposure, fall protection and scaffolding.
* Ensure qualified persons are assigned to review and update this safety and health program as necessary.
* As part of performance evaluations, hold supervisors accountable for the success or failure of achieving specific safety and health performance and insurance cost control goals.
* Periodically take part in employee safety training.
* Review all injury and accident reports and OSHA 300 Logs and complete electronic reporting to OSHA.
* Report any reportable event that occurs to an employee of the company to OSHA:
	+ Fatality: within 8 hours
	+ Hospitalization: within 24 hours
	+ Amputation: within 24 hours
	+ Loss of Eye: within 24 hours

**Worker Participation**

This Safety & Health Program conforms to the best practices of siding contractors. To make the program work, all company employees must have good attitudes about preventing injuries and illnesses. The participation of employees in our Safety & Health Program is crucial for its success. Success requires cooperation between each employee and his or her co-workers. With cooperative effort and positive attitudes, the Safety & Health Program will benefit all the employees of the company, subcontractors, visitors and others who may be in our work area. Each employee is required, as a condition of employment with the company, to read, understand and sign the EMPLOYEE COMMITMENT TO WORK SAFELY.

**EMPLOYEE RESPONSIBILITY**

Safety is a management responsibility; however, management cannot be solely responsible for the acts of employees. Therefore, each employee shall, as a condition of employment for which he or she is paid, be responsible to work safely, including but not limited to the following specific responsibilities and duties:

**General Safety and Health Responsibilities:**

* Study, understand, and comply with the requirements of the SAFETY & HEALTH PROGRAM and comply with any other Federal, state and local codes, laws or regulations which may apply to his or her work.
* Work in a manner which will avoid self-injury and prevent injury to fellow workers.
* Attend any required employee safety and health training.
* Acknowledge, by personal signature, any training received.
* Refuse to perform any potentially hazardous or non-routine task, or to use any hazardous material, until properly trained about the hazards involved, and about the proper safety and health procedures to follow.
* Properly use and care for personal protective equipment required for the task at hand.
* Report any hazardous condition to the employee's supervisor, including any negligent act, a physical or health hazard, any unsafe use of hazardous materials by company employees or by an employee of some other employer in the jobsite.
* Report any job-related injury or illness to the employee's supervisor and seek treatment immediately. Reporting of any injury or illness shall be made as soon as practical and should take place within 24 hours except under unusual circumstances.
* Know what emergency telephone numbers to call in the event of a fire, accident or personal injury.
* Help to maintain a safe and clean work area.
* Assist management with improving this Safety & Health Program.
* Drug and alcohol-free workplace.

**Hazard Communication Responsibilities:**

* Know the location of the written Hazard Communication Plan, the Chemical Inventory List and the Safety Data Sheets (SDS) with emergency contact numbers.
* Refuse to use any hazardous material if not trained in its use. Request a refresher training if unsure about the use, storage, handling or personal protective equipment requirements.
* Know how to read a SDS, the Chemical Inventory List, chemical warnings, and labels.
* Never remove nor deface hazardous chemical labels.
* Know how to detect the presence of a hazardous chemical in the jobsite by odor and/or appearance.
* Never waste hazardous chemicals on site. Dispose of hazardous chemicals correctly per the manufacturer. (i.e., do not dump hazardous materials on the earth)
* Become trained in the proper use of required protective equipment, and wear or use such equipment properly while working with hazardous chemicals.
* Be properly trained about the hazards of any assigned work tasks, about which the employee has not been previously trained, before attempting to perform such "non-routine" tasks.

**Safety & Health Training**

All workers, including supervisors, shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

* To all new workers.
* To all workers given new job assignments for which training has not previously provided.
* Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard.
* Whenever the employer is made aware of a new or previously unrecognized hazard.
* When an employee’s behavior shows that re-training is necessary.
* To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed.
* To all workers with respect to hazards specific to each employee's job assignment.

Management and supervisors shall provide or arrange to have this training provided. Documentation of training is required. The Employee Training Record Form should be used to document all training.

There are many training requirements found in OSHA standards that would apply to siding contractors. Many of these training requirements are covered in Section 3 – Safe Work Practices portion of this safety program. The NAHB has many safety training resources available including video tool box talks available in English and Spanish. These training resources can be found here: <https://www.nahb.org/en/research/safety>.

**Employee commitment to Safety & Health**

It is the policy of the company that every employee is entitled to work under the safest possible conditions in the construction industry. To this end, every reasonable effort shall be made in the interest of accident prevention to provide for safe and healthy working conditions and to eliminate hazards that can cause injury to workers or damage to property and equipment. Accident prevention is a field responsibility and as such, supervisory personnel and employees shall be accountable for the safe operation on their jobsites. Our policy is to develop and maintain an effective program for safe production. This policy illustrates Management’s acceptance and recognition of the fact that accident prevention and production are synonymous. Therefore, planning for Accident Prevention will be incorporated in all phases of the company’s work.

The company is sincerely interested in your safety. The policy of the company is to provide safe equipment, adequate tools, and the necessary protection equipment. It is your responsibility to follow the rules of safety as established for your protection and to use the protective devices, which the company furnishes.

***WE BELIEVE IN SAFETY AND INSIST UPON IT***

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (PRINT NAME) HAVE READ AND UNDERSTAND THE COMPANY SAFETY & HEALTH PROGRAM. I UNDERSTAND THAT ANY QUESTIONS SHOULD BE DIRECTED TO MY SUPERVISOR. I ALSO UNDERSTAND THAT THE FULL PROGRAM WILL BE MADE AVAILABLE UPON REQUEST.

|  |  |
| --- | --- |
|  |  |
| **EMPLOYEE SIGNATURE** | **DATE** |
| Once this form is complete, please remove it and return to your manager |

**Hazard Identification & Assessment**

Prior to starting work on a jobsite, the supervisor shall inspect the work area to determine if there are any hazards that exist. These hazards should be prevented and/or controlled as detailed in the next section of this program. Unique and/or special hazards not previously identified and detailed in this safety & health program shall be brought to the attention of management prior to starting work. Management and the supervisor shall jointly determine the best way to proceed. Depending on the nature of the hazard, a job hazard analysis could be performed to assist.

A job hazard analysis (JHA) is a technique that focuses on job tasks to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. Ideally, after you identify uncontrolled hazards, you will take steps to eliminate or reduce them to an acceptable risk level.

OSHA has a publication that further explains this process: <https://www.osha.gov/Publications/osha3071.pdf>

Effective controls protect workers from workplace hazards, help avoid injuries, illnesses, and incidents; minimize or eliminate safety and health risks; and help employers provide workers with safe and healthy working conditions. The following are general safety and health guidelines to be followed on our jobsites.

**First Aid and Medical Treatment**

First aid supplies are provided on the jobsite. Qualified personnel are available to render minor treatment and to maintain required records. Make sure you know where the first aid supplies are located on the jobsite.

* Report all injuries immediately, no matter how minor, to your supervisor. Treatment will be forthcoming, and the incident will be recorded as required.
* You must notify your supervisor prior to leaving the jobsite because of an injury or illness, whether personal or work related.
* All medical treatment for work related injuries must be obtained from an authorized workers compensation clinic or authorized urgent care clinic unless you have received PRIOR WRITTEN AUTHORIZATION from the management to use a different facility.
* Prior to returning to work after a lost time injury or illness, you must present a medical clearance to your supervisor from the attending physician.
* If you have a physical handicap, such as diabetes, impaired eyesight, or hearing, back or heart trouble, hernia, or aversion to heights, tell your supervisor. You won’t be expected to do a job, which might result in injury to yourself or someone else.
* Never move an injured or seriously ill person unless necessary to prevent further injury. First aid should not be administered by non-designated employees except in cases of severe bleeding or cessation of breathing.
* When an accident is reported late, it may be challenged for that reason. Please report all injuries ASAP.

**Personal Protective Equipment (PPE)**

The company will provide all employees with required PPE according to the task and known hazards. Engineering controls shall be the primary methods used to eliminate or minimize hazard exposure in the workplace. An example of an engineering control is using a saw with a vacuum instead of just using a dust mask. When such controls are not practical or applicable, personal protective equipment shall be employed to reduce or eliminate personnel exposure to hazards. Personal protective equipment (PPE) will be provided, used, and maintained when it has been determined that its use is required and that such use will lessen the likelihood of occupational injuries and/or illnesses. Personal Protective Equipment that is recommended by safety data sheets or tool manufactures must be adhered to. Company policy may dictate PPE, which exceeds the requirements of the above-mentioned sources.

All personal protective clothing and equipment will be carefully selected for the work to be performed. Only those items of protective clothing and equipment that meet National Institute of Occupational Safety and Health (NIOSH) or American National Standards Institute (ANSI) standards will be procured or accepted for use.

Hazard assessment and equipment selection—Hazard analysis procedures shall be used to assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the following actions will be taken:

* Select, and have each affected employee use, the proper PPE
* Communicate selection decisions to each affected employee
* Select PPE that properly fits each affected employee.

Defective or damaged personal protective equipment shall not be used.

**Head Protection**

* Workers must wear hard hats (ANSI Z89.1 approved) when overhead, falling, or flying hazards exist or when danger of electrical shock is present.
* Inspect hard hats routinely for dents, cracks, or deterioration.
* If a hard hat has taken a heavy blow or electrical shock, you must replace it even when you detect no visible damage.
* Maintain hard hats in good condition; do not drill; clean with strong detergents or solvents; paint; or store them in extreme temperatures.

**Eye and Face Protection**

* Workers must wear safety glasses (ANSI Z87 approved) and/or face shields for welding, cutting, nailing (including pneumatic), or when working with concrete and/or harmful chemicals.
* Eye and face protectors are designed for particular hazards so be sure to select the type to match the hazard.
* Replace poorly fitting or damaged safety glasses.

**Foot Protection**

* Workers must wear shoes or boots with slip-resistant and puncture-resistant soles (to prevent slipping and puncture wounds).
* Safety-toed shoes are recommended to prevent crushed toes when working with heavy rolling equipment or falling objects.

**Hand Protection**

* High-quality gloves can prevent injury.
* Gloves should fit snugly.
* Glove gauntlets should be taped for working with fiberglass materials.
* Workers should always wear the right gloves for the job.

**Housekeeping and Access On-Site**

Attention to general cleanliness, storage and housekeeping can prevent numerous accidents. Good housekeeping efforts are a vital part of our Safety & Health Program.

Improper housekeeping and material storage can create or hide numerous hazards such as:

* Slip & trip hazards
* Chemical exposure
* Contact with sharp objects
* Impalement hazards
* Fire & Explosion hazards

Hazard control procedures:

* Keep all walkways and stairways clear of trash/debris and other materials such as tools and supplies to prevent tripping.
* Keep boxes, scrap lumber and other materials picked up.  Put them in a dumpster or trash/debris area to prevent fire and tripping hazards.
* Provide enough light for workers to see and to prevent accidents.

**Fall Protection**

Falls are the leading cause of death in the construction industry. OSHA requires fall protection be provided anytime a fall hazard of six (6) feet or more exists. In the siding industry, our major fall risks are when working on elevated work levels, such as decks, low roofs, mobile work platforms, and scaffolding. OSHA recognizes conventional fall protection to be: Personal Fall Arrest Systems, Guardrails and Safety Net Systems. As a siding contractor we will use both personal fall arrest systems and guardrail systems. Safety net systems will not be used.

Prior to construction, the fall protection system utilized should be pre-planned by a qualified person and during construction, the fall protection system should be continually monitored and adjusted as necessary. The following hierarchy of fall protection should be followed:

**Guardrail Systems**

Guardrails are a preferred type of fall protection. These systems can be used effectively on some elevated work levels such as decks and scaffolding. Keeping these areas safe is always a requirement. Follow these procedures:

* Install guardrails around openings in floors and across openings in walls when the fall distance is 6 feet or more. Be sure the top rails can withstand a 200-lb load.
* Construct guardrails with a top rail approximately 42” (39” to 45”) high with a midrail at 21”.
* Install toe boards that are at least 3.5” high.
* Approved guardrails or covers must protect floor openings and/or holes. If covers are used, they must be able to support 2 times the intended load imposed upon them, marked, and secured to prevent accidental displacement.
* Do not remove covers on floor openings without approval from your supervisor. When a cover has been removed to bring in equipment or material, replace the opening immediately upon completion of material handling.

**Personal Fall Arrest Systems (PFAS)**

Personal Fall Arrest Systems consist of an anchorage point, full body harness and lanyard/lifeline. PFAS is the most likely option our company will employ when working on low roofs. If a personal fall arrest system is used for fall protection, it must:

* Limit maximum arresting force on an employee to 1,800 pounds
* Be rigged so that an employee can neither free fall more than 6 feet nor contact any lower level
* Bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet
* Have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet
* Personal fall arrest systems must be inspected prior to each use for wear, damage, and other deterioration.
* Workers must be trained in the use and maintenance of the equipment they are using.
	+ Rescue planning should be undertaken prior to allowing any worker to work in a PFAS.
* Any PFAS equipment shall be taken out of service if involved in a fall.

**Scaffold Safety**

Scaffold use is a major part of our operations. Common types of scaffolds used by siding contractors include Pump Jacks and Ladder Jacks. These procedures shall always be followed. Specific scaffold manufacturer recommendations shall also be followed.

Scaffolds shall be erected, moved, dismantled, or altered only under the supervision of a competent person and will have guardrails and toeboards installed. When scaffolding hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, Personal Protective Equipment (PPE), and proper training regarding Scaffolds will be implemented. These measures will be implemented to minimize those hazards to ensure the safety of employees and the public.

The competent person will oversee the scaffold selection, erection, use, movement, alteration, dismantling, maintenance, and inspection. The competent person will be knowledgeable about proper selection, care, and use of the fall protection equipment. Additionally, the competent person shall assess hazards. A documented inspection is required by the competent person each day prior to use. This inspection should be documented. The scaffolding inspection requirements and a scaffolding inspection form can be found at the end of this section.

General scaffolding safety procedures:

* The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose brick, or concrete blocks shall not be used to support scaffolds or planks.
* No scaffold shall be erected, moved, dismantled, or altered except under the supervision of a competent person.
	+ Personnel working on scaffolds must be trained on the use of scaffolds and hazards associated with scaffolds.
* Guardrails and toeboards shall be installed on all open sides and ends of platforms more than 10 feet above the ground or floor, except ladder jack scaffolds. PFAS must be used on ladder jack scaffolds.
* Guardrails must be 2” x 4”, or the equivalent, approximately 42” high (between 38” and 45”), with a midrail. Vertical supports must be at intervals not to exceed 8 feet. Toeboards and guardrails shall extend along the entirety of the open sides and ends of platforms.
* Scaffolds and their components must be capable of supporting without failure at least 4 times the maximum intended load.
* Any scaffold, including accessories such as braces, brackets, trusses, screw legs, ladders, couplers, etc., damaged or weakened from any cause must be repaired or replaced immediately, and shall not be used until repairs have been completed.
* All wood planking must be scaffold grade lumber, or equivalent, as recognized by approved grading rules for the species of wood used.
* Aluminum or other manufactured planking must be kept in good condition, free of defects.
* All planking or platforms must be overlapped (minimum 12”) or secured from movement.
* An access ladder or equivalent safe access must be provided when the scaffold is 24” or more off the ground.
* Planks must extend over their end supports not less than 6” or more than 12” (18” for planks greater than 10’).
* The poles, legs, or uprights of scaffolds must be plumb, secure, and rigidly braced to prevent swaying and displacement.
* Overhead protection must be provided for workers on scaffold exposed to overhead hazards.
* Slippery conditions on scaffolds shall be eliminated immediately after they occur.
* A safe distance from energized power lines shall be maintained (minimum 10’).
* Scaffolds shall not be used during high wind and storms.
* Ladders and other devices shall not be used to increase working heights on scaffold platforms.
* Scaffolds shall not be moved while employees are on them.
* Loose materials, debris, and/or tools shall not be accumulated to cause a hazard. Only tools and material used that day should be left on the scaffolding platform.
* Scaffold components shall not be mixed or forced to fit which may reduce design strength.
* Casters and wheel stems shall be pinned or otherwise secured in scaffold legs. Casters and wheels must be positively locked if in a stationary position.

Scaffolding Inspection Requirements:

All scaffolding must be inspected by a competent person prior to use and after any changes to the scaffolding. Employees are not allowed to work on the scaffolding until they have received the authorization from the competent person. Scaffolding inspections shall be documented.

**Ladder Safety**

When tasks require a ladder to conduct work use only manufactured ladders or ladders built to ANSI standards. There is no excuse for using a makeshift means of access to a work area. If the appropriate ladder is not available, discuss with your supervisor. In addition to using the correct ladder for the job, follow these guidelines:

* Keep all ladders in good condition and free of defects.
* Inspect ladders before use for broken rungs or other defects so falls don't happen.  Broken or damaged ladders must not be used. Repair or destroy them immediately. Ladders to be repaired must be tagged “DO NOT USE.”
* Secure ladders near the top and/or at the bottom to prevent them from slipping and causing falls.
* When you can't secure the ladder, be sure the ladder is on a stable and level surface, so it cannot be knocked over or the bottom of it kicked out.
* Place extension ladders at the proper angle of 4:1 (for every 4 vertical feet the base needs to extend 1 foot). For example, if the top of the ladder is at 12 feet in height, the base needs to extend 3 feet.
* Extension ladders are to be installed at least 3 feet above the landing to provide a handhold or for balance when getting on and off the ladder from other surfaces.
* Do not set up a ladder near passageways or high traffic areas where it could be knocked over.
* The areas around the top and base of ladders must be free of tripping hazards such as loose materials, trash, and electrical cords.
* Use ladders only for what the manufacturer intended and not as a platform, runway, or as scaffold planks.
* Always face the ladder and maintain 3 points of contact when climbing or descending a ladder.
* Be sure that your shoes are free of mud, grease, or other substances, which could cause a slip or fall.
* Do not carry materials up a ladder. Use a hand line or other means to get materials to a higher level.
* Always move the ladder to avoid overreaching, the belt buckle of your body should never extend beyond the ladders side rail.
* Do not splice together short ladders to make a longer ladder.
* Stepladders must be fully opened to permit the spreader to lock, they are not allowed to lean on a wall.
* You are prohibited from standing on the top two steps of a stepladder.
* Rungs must be parallel, level and of uniform length.
* Ladders should be set up and used on stable, level surfaces.
* Ensure ladders are equipped with proper labels detailing type and rating.
* Metal ladders must not be used in areas where they could contact energized wiring. The use of metal ladders is restricted to special applications where the heavier wooded ladders are not practical.
* Use only Type I (250lb to 375lb weight capacity) or Type II (225lb weight capacity) ladders. Type III ladders are never to be used
	+ as they are designed for household use.
* Ladders must be able to sustain 3 times the intended load and never overload beyond its intended capacity.

**Hand & Power Tool Safety**

Use of tools makes many tasks easier. However, the same tools that assist us, if improperly used or maintained, can create significant hazards in our work areas. Employees who use tools must be properly trained to use, adjust, store and maintain tools properly. This part covers hand & power, pneumatic and powder actuated tool safety.

Only tools in safe working condition should be used. You must observe the following safe practices:

* Inspect your tools daily to ensure that they are in proper working order. Damaged or defective tools must be tagged out of service and removed from the jobsite until repaired.
* Power saws, grinders, and other power tools must always have proper guards in place.
* Power tools should be hoisted or lowered by a hand line, never by the cord or hose.
* Cords and hoses must be kept out of walkways and off stairs and ladders. They must be placed so as not to create a tripping hazard for employees or to be subjected to damage from equipment or materials.
* Electric powered tools and equipment must always be grounded when in use.
* Hand tools should be used for their intended purpose only. The design capacity of hand tools should not be exceeded by unauthorized attachments.
* When using the tool listed below or working near others using such tools, you must use personal protective equipment. If you have questions about the protective equipment or safety rules, discuss this with your supervisor or refer to manufacturer’s recommendations.
* Always Use GFCI protection.
* Safety devices should never be altered or removed.

Pneumatic tools are powered by compressed air and include nail guns, chippers, drills, and sanders. There are several dangers encountered in the use of pneumatic tools. The main one is the danger of getting hit by one of the tool’s attachments or by some kind of fastener the worker is using with the tool. Eye protection is required, and face protection is recommended for employees working with pneumatic tools.

* When using pneumatic tools, employees are to check to see that they are fastened securely to the hose to prevent them from becoming disconnected. A short wire or positive locking device attaching the air hose to the tool will serve as an added safeguard.
* Compressed air guns should never be pointed toward anyone. Users should never “dead-end” it against themselves or anyone else.
* Spring loaded safety devices should never be modified.

**Electrical Safety**

Exercise caution when working with and around electricity. Electrical accidents are one of the OSHA Focus Four hazards and electrical accidents usually result in shocks, burns and fires.

It doesn’t take much electrical current to cause a serious injury.

* Exposure to .06 Amps (the electricity needed to light a Christmas tree bulb) can be fatal.
* Household circuit breakers do not trip until 15 or 20 Amps. They are not designed to protect humans.

Controlled grounding provides a safeguard.

* If electricity leaks through defective wiring in a tool, the ground wire will direct the electricity back to ground.
* The ground wire is easily visible in three-pronged plugs.
* In order for a ground wire to be effective, it must be pulled into a grounded outlet.
* You can’t tell if an outlet is grounded just by looking at it (it must be tested).

Ground Fault Circuit Interrupters (GFCI) provide additional safety for the worker.

* They immediately shut off the flow of electricity when they sense a change in the strength of the current.
* If a defective tool leaks electricity that might cause a shock, a GFCI will cut off the power.
* Always plug your tools into GFCI protected outlets.

Remember that electrical equipment should be properly grounded.

* Never alter three-pronged plugs to fit into two-pronged outlets.
* Temporary wiring must be GFCI protected.

You should exercise caution when selecting and working with electrical equipment.

* Use a double insulated tool when possible or ensure tool has ground pin.
* Look for sparks being thrown off by electrical equipment.
* Unless you are qualified, don’t try to fix problems yourself.
* Tell your supervisor and contact a repair person.

Working around overhead power lines can also be dangerous.

* Always maintain a safe distance. Most overhead power lines require clearance of at least 10 feet.
* Look up and around before setting up scaffolding or ladders.
* Don’t use metal ladders or scaffolding around power lines.

All electrical cords and tools must be in good repair.

* Do not splice 120v or 220v wires.
* Tools that have had their electrical cords replaced shall be done with factory cords, no extension cord shall be wired to a tool.
* No wires shall be exposed. This includes ground wires.
* Extension cords going through doorways or windows shall be protected from being damaged.
* All 120v systems shall be protected by a breaker and a GFCI.
* Use only 3-wire type extension cords designed for hard or junior hard service.  (Look for any of the following letters imprinted on the casing: S, ST, SO, STO, SJ, SJT, SJO, SJTO.)
* Electrical cords must be free of frays, gouges and exposed wires.

**Fire Prevention**

Fires on the jobsite can have catastrophic results. Working to prevent fires is always critical on the jobsites. Fire and explosion hazards can exist in almost any work area.

All nonessential ignition sources must be eliminated where flammable liquids are used or stored. The following is a list of some of the more common potential ignition sources:

* Open flames, such as cutting and welding torches, furnaces, matches, and heaters-these sources should be kept away from flammable liquid operations. Cutting or welding on flammable liquid equipment should not be performed unless the equipment has been properly emptied and purged with a neutral gas such as nitrogen.
* Chemical sources of ignition such as DC motors, switched, and circuit breakers-these sources should be eliminated where flammable liquids are handled or stored. Only approved explosion-proof devices should be used in these areas.
* Mechanical sparks-these sparks can be produced as a result of friction. Only non-sparking tools should be used in areas where flammable liquids are stored or handled.
* Static sparks-these sparks can be generated as a result of electron transfer between two contacting surfaces. The electrons can discharge in a small volume, raising the temperature to above the ignition temperature. Every effort should be made to eliminate the possibility of static sparks. Also, proper bonding and grounding procedures must be followed when flammable liquids are transferred or transported.

A portable fire extinguisher is a "first aid" device and is very effective when used while the fire is small. The use of a fire extinguisher that matches the class of fire, by a person who is well trained, can save both lives and property. Portable fire extinguishers must be installed in workplaces regardless of other firefighting measures. The successful performance of a fire extinguisher in a fire situation largely depends on its proper selection, inspection, maintenance, and distribution.

Employees should be trained on to use the PASS method to extinguish a fire:

**P**ull the pin

**A**im the nozzle at the base of the fire

**S**queeze the trigger

**S**weep the nozzle at fire

**Mobile Equipment**

* Train workers to stay clear of vehicles backing up or turning and equipment with rotating cabs.
* Be sure that all off-road equipment used on site is equipped with rollover protection (ROPS).
* Maintain back-up alarms for equipment with limited rear view or use a spotter to help guide them.
* 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.
* Verify experience or provide training to equipment operators.
* Deploy the parking brake and/or properly chock wheels when on an incline.

**Vehicle Safety**

Vehicular accidents are the number one killer of workers in the United States. This portion covers safe operation and maintenance of all company vehicles. Examples of vehicles covered include company-owned-or-leased passenger vehicles, pickup trucks, light trucks and vans that do not require a commercial driver's license for operation. Privately owned vehicles used during and for work purposes should also follow these guidelines.

**Guidelines**

* All company vehicles will be operated only by employees authorized by company management for specific company purposes.
* Vehicles will always be maintained in a safe condition. In the event of an unsafe mechanical condition, the vehicle will be immediately placed out of service and the appropriate manager notified.
* Only qualified company vehicle mechanics or approved service facilities are permitted to perform maintenance on company vehicles.
* All vehicles will be operated, licensed and insured in accordance with applicable local, state and federal laws.
* All employees authorized to operate any company owned or leased vehicle will be included in the company random drug-testing program.
* All authorized employees must possess a valid state driver's license for the class vehicle authorized.
* Authorized employees must have a driving record at least equal to that required for maintaining a commercial driver's license.

**Driving Safely**

Starting

* Conduct pre-use inspection
* Use seatbelts always
* Adjust seat & mirrors before starting vehicle
* Allow at least a 15 second warm up time
* Check for warning lights

Driving

* Do not drive if drowsy
* Think ahead - anticipate hazards
* Don't trust the other driver to drive properly
* Don't speed or tailgate
* Drive slower in hazardous conditions or hazardous areas
* Pass only in safe areas and when excessive speed is not required
* No loose articles on the floor
* Do not read, write, apply make-up, drink, eat or use a phone while driving
* Stay at least four seconds behind the vehicle ahead
* Do not stop for hitchhikers or to provide roadside assistance

Backing

* Back slowly & be ready to stop
* Do not back up if anyone is in path of vehicle travel
* Check clearances
* Don't assume people see you
* Getting out & check if you cannot see from the driver's seat

Stopping

* Park only in proper areas, not roadsides
* Use warning flashers & raise hood if vehicle becomes disabled

Accidents

* Do not admit responsibility
* Notify your company and law enforcement as soon as possible
* Cooperate with any law enforcement officers
* Move the vehicle only at the direction of a law enforcement officer
* Do not sign any forms unless required by a law enforcement officer
* At the scene get the following information
* Investigating officer name and law enforcement agency
* Make, Model & License Plate number of other vehicles
* Names, addresses and phone numbers of all witnesses
* Photos of accident
* All 4 sides of all vehicles
* Roads and intersection at the scene
* Interior of all vehicles - seating & floor areas
* Name, address & license of other drivers

**Material Storage & Handling**

* All material must be properly stacked and secured to prevent sliding, falling, or collapse. Aisles, stairs, passageways must always be kept clear.
* Material shall not be stored inside within 6’ of a floor opening or nor within 10’ of an exterior wall or window opening.
* Protruding nails must be bent or pulled when stripping forms or uncrating materials.
* Materials or scrap should never be dropped from elevated levels without trash chutes.
* Stored materials must not block any exit from a building.
* Exposed rebar and other impalement hazards must be properly protected.

**Manual Lifting**

* Leg muscles are stronger than back muscles. Lift with your legs, not your back. Bend knees and keep your back straight.
* Plan before you pick up, consider weight, size, shape, path of travel, and set down location.
* Protect your hands and fingers from rough edges, sharp corners, metal straps. Keep hands and fingers out of pinch points between the load and other objects.
* For heavier loads seek mechanical means such as a forklift or use a buddy system.

**Chemical Safety and Hazard Communication**

**General Chemical Safety**

Assume all chemicals are hazardous. The number of hazardous chemicals and the number of reactions between them is so large that prior knowledge of all potential hazards cannot be assumed. Use chemicals in as small quantities as possible to minimize exposure and reduce possible harmful effects. Any employees who are required to use or handle hazardous chemicals will be trained in how to safely use those specific chemicals.

The following general safety rules shall be observed when working with chemicals:

* Read and understand the Safety Data Sheets.
* Keep the work area clean and orderly.
* Use the necessary safety equipment.
* Carefully label every container with the identity of its contents and appropriate hazard warnings.
* Store incompatible chemicals in separate areas.
* Substitute less toxic materials whenever possible.
* Limit the volume of volatile or flammable material to the minimum needed for short operation periods.
* Provide means of containing the material if equipment or containers should break or spill their contents.

**Task Evaluation**

Each task that requires the use of chemicals should be evaluated to determine the potential hazards associated with the work. This hazard evaluation must include the chemical or combination of chemicals that will be used in the work, as well as other materials that will be used near the work. If a malfunction during the operation has the potential to cause serious injury or property damage, a Safe Operational Procedure (SOP) should be prepared and followed. Operations must be planned to minimize the generation of hazardous wastes.

**Chemical Storage**

The separation of chemicals (solids or liquids) during storage is necessary to reduce the possibility of unwanted chemical reactions caused by accidental mixing. Explosives should be stored separately outdoors. Use either distance or barriers (e.g., trays) to isolate chemicals into the following groups:

* Flammable Liquids: store in approved flammable storage lockers.
* Acids: treat as flammable liquids
* Bases: do not store bases with acids or any other material
* Other liquids: ensure other liquids are not incompatible with any other chemical in the same storage location.
* Lips, strips, or bars are to be installed across the width of storage shelves to restrain the chemicals in case of earthquake.
* Chemicals will not be stored in the same refrigerator used for food storage. Refrigerators used for storing chemicals must be appropriately identified by a label on the door.

**Container Labels**

It is extremely important that all containers of chemicals are properly labeled. This includes every type of container from a spray bottle of degreaser to a 5000-gallon storage tank. The following requirements apply:

* All containers will have the appropriate label; tag or marking prominently displayed that indicates the identity, safety and health hazards.
* Portable containers, which contain a small amount of chemical, need not be labeled if they are used immediately that shift, but must be under the strict control of the employee using the product.
* All warning labels, tags, etc., must be maintained in a legible condition and not be defaced. Facility weekly supervisor inspections will check for compliance of this rule.
* Incoming chemicals are to be checked for proper labeling.

OSHA has updated the requirements for labeling of hazardous chemicals under its Hazard Communication Standard (HCS). As of June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised HCS label, identifying the required label elements, is shown on below:



**Hazard Communication Standard Pictograms**

The Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification. Pictograms and hazards are found below:



**Emergencies and Spills**

In case of an emergency, implement the proper Emergency Action Plan.

* Evacuate people from the area.
* Isolate the area.
* If the material is flammable, turn off ignition and heat sources.
* Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures beyond those required to evacuate the area.
* Call for Emergency Response Team assistance if required.

**Housekeeping**

* Maintain the smallest possible inventory of chemicals to meet immediate needs.
* Periodically review stock of chemicals on hand.
* Ensure that storage areas, or equipment containing large quantities of chemicals, are secure from accidental spills.
* *DO NOT* place hazardous chemicals in salvage or garbage receptacles.
* *DO NOT* pour chemicals onto the ground.
* *DO NOT* dispose of chemicals through the storm drain system.
* *DO NOT* dispose of highly toxic, malodorous chemicals down sinks or sewer drains.

**Employee Use of SDSs**

For SDS use to be effective, employees must:

* Know the location of the SDS
* Understand the major points for each chemical
* Check SDS when more information is needed, or questions arise
* Be able to quickly locate the emergency information on the SDS
* Follow the safety practices provided on the SDS

**Location of SDSs**

The supervisor of the jobsite will conduct a Hazardous Chemical Inventory. From this inventory, a Chemical Inventory List will be created. The Chemical Inventory List and SDSs will be kept on the jobsite. A Chemical Inventory List form is found in the Forms section of this program.

**Training**

Employees will be trained in hazard communication. The training will be documented on the Employee Training Record Form found in this program. Employees will be trained in the following areas:

* Chemical Storage
* Container Labels
* Emergencies and Spills
* Housekeeping
* Safety Data Sheets (SDS)
* General Chemical Usage
* Specific Chemical Hazards and Precautions

**Silica Exposure Control Plan**

**Purpose**

The purpose of this Exposure Control Plan (ECP) is to protect company employees from exposure to Crystalline Silica. OSHA has determined that exposure to crystalline silica above the OSHA Permissible Exposure Limit (PEL) can cause health issues for the workers exposed. Due to the nature of the company’s work, employees may be exposed to crystalline silica while cutting fiber cement board. This plan is designed to control the exposure to below the Permissible Exposure Limit (PEL) and keep our employees safe. The safety and health of our employees is paramount.

Regulatory Reference: §1926.1153 Respirable Crystalline Silica

**Policy**

Employees that will be working with fiber cement board must be trained on the elements of this plan. Employees who have not been through this training are not permitted to enter areas where tasks are being performed by our company or other contractors on the jobsite where there is potential exposure to crystalline silica.

***No company employees can enter an area where other contractors are working with crystalline silica, or a dust cloud is being created by the other contractors’ work. Employees must always stay out of these areas.***

**What is Crystalline Silica?**

Crystalline silica is a basic component of soil, sand, granite, and many other minerals. Quartz is the most common form of crystalline silica. Crystalline silica may become respirable size particles when workers chip, cut, drill, or grind objects that contain crystalline silica. Prolonged exposure to respirable crystalline silica can cause silicosis, lung cancer, other respiratory diseases, and kidney disease. Keeping silica out of the air can reduce the hazard, so wet methods for cutting, drilling, etc. are preferable if feasible.

**Responsibilities**

We firmly believe protecting the health and safety of our employees is everyone’s responsibility. This responsibility begins with upper management providing the necessary support to properly implement this plan. However, all levels of the organization assume some level of responsibility for this plan including the following positions.

* Management:
	+ Conduct job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments to determine if an employee’s exposure will be above 25 μg/m3 as an 8-hour TWA under any foreseeable conditions.
	+ Select and implement the appropriate control measures in accordance with the Construction Tasks identified in OSHA’s Construction Standard Table 1 or alternative exposure control methods.
	+ Ensure that the materials, tools, equipment, personal protective equipment (PPE), and other resources (such as worker training) required to fully implement and maintain this plan are in place and readily available if needed.
	+ Ensure that supervisors and employees are educated in the hazards of silica exposure and trained to work safely with silica in accordance with OSHA’s Respirable Crystalline Silica Construction Standard and OSHA’s Hazard Communication Standard. Supervisors and Competent Persons may receive more advanced training than other employees.
	+ Maintain written records of training, inspections, medical surveillance (if necessary), respiratory medical clearances, and fit-test results.
	+ Conduct an annual review of the effectiveness of this plan. This includes a review of the available dust control technologies to ensure these are selected and used when practical.
	+ Coordinate work with other employers and contractors to ensure a safe work environment relative to Silica exposure.
* Supervisors / Competent Person
* Ensure all applicable elements of this plan are implemented on the project.
* Ensure that employees using respirators have been properly trained, medically cleared, and fit-tested in accordance with the company’s Respiratory Protection Program.
* Ensure that work is conducted in a manner that minimizes and adequately controls the risk to workers and others. This includes ensuring that workers use appropriate engineering controls, work practices, and wear the necessary PPE.
* Where there is risk of exposure to Silica dust, verify employees are properly trained on the applicable contents of this plan, the applicable OSHA Standards (such as Hazard Communication). Ensure employees are provided appropriate PPE when conducting such work.
	+ Conduct frequent and regular inspections of job sites, materials, and equipment to implement the exposure control plan.
	+ Identify existing and foreseeable Respirable Crystalline Silica hazards in the workplace and take prompt corrective measures to eliminate or minimize them.
	+ Notify Management of any deficiencies identified during inspections to coordinate and facilitate prompt corrective action.
* Employees
	+ Follow recognized work procedures as established in this plan.
	+ Use the assigned PPE in an effective and safe manner.
	+ Participate in Respirable Crystalline Silica exposure monitoring and the medical surveillance program if necessary.
	+ Report any unsafe conditions or acts to Project Management / Site Management and/or the Competent Person.
	+ Report any exposure incidents or any signs or symptoms of Silica illness.

**Competent Person**

The company has designated \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ as the competent person for tasks associated with this exposure control plan. The competent person is responsible for implementing this exposure control plan and will work with other supervisors and all employees to keep the workers safe.

**Table 1**

OSHA issued Table 1 as part of the standard. Table 1 matches common construction tasks with dust control methods, so employers know exactly what they need to do to limit worker exposures to silica. The company has determined that performing the task of cutting fiber cement board as listed on Table 1. The Table 1 requirement for this task is listed below:

|  |  |  |
| --- | --- | --- |
|  |  | Required Respiratory Protection and Minimum Assigned Protection Factor (APF) |
| Equipment / Task | Engineering and Work Practice Control Methods | ≤ 4 hours /shift | > 4 hours /shift |
| (iii) Handheld power saws for cutting fiber- cement board (with blade diameter of 8 inches or less) | For tasks performed outdoors only:Use saw equipped with commercially available dust collection system.Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency. | None | None |

**Respiratory Protection**

Respiratory protection will not be required as shown in Table 1 for the task of cutting fiber cement board.

**Housekeeping**

Cleaning methods such as dry sweeping, dry brushing, and use of compressed air can cause respirable crystalline silica dust to get into the air and be inhaled by employees. Therefore, the silica standard limits the use of these cleaning methods to prevent unnecessary exposures to employees. The company requires employees to use other cleaning methods such as wet sweeping and HEPA filtered vacuums, whenever feasible, because such methods reduce employee exposures by preventing silica-containing dust from getting into the air.

Proper housekeeping is an important element of this exposure control plan. When cleaning up dust that could contribute to the exposure to respirable crystalline silica, employees must not:

* Perform any dry brushing or dry sweeping
* Perform cleaning of surfaces or clothing with compressed air

If an employee believes the methods listed above are not feasible, this must be discussed with the competent person to determine an alternative plan for housekeeping.

**Medical Surveillance**

Medical surveillance is not required because our employees will not be required to wear respirator protection when cutting fiber cement board per Table 1.

**Training**

The company will train and inform employees covered by the silica standard about respirable crystalline silica hazards and the methods the employer uses to limit their exposures to those hazards. This training will be conducted by the Competent Person or other equally qualified individual. The training will be documented. Re-training will be conducted if an employee doesn’t follow the plan as required.

**Hazard Communication**

The company will include Respirable Crystalline Silica in the company’s Hazard Communication Program established to comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200). We will ensure that each employee has access to labels on containers of Crystalline Silica and those containers Safety Data Sheets (SDS’s).

All employees will be trained in accordance with the provisions of the OSHA Hazard Communication Standard and the Training Section of this plan. This training will cover concerns relating to cancer, lung effects, immune system effects, and kidney effects.

Our hazard communication plan is found in the next section of this safety & health program.

**Exposure Assessment/Monitoring**

The company will not conduct any monitoring because we are following Table 1 for fiber cement board.

**Program Evaluation**

This program will be reviewed and evaluated on an annual basis by the Management unless changes to operations, the OSHA Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153), or another applicable OSHA Standard require an immediate evaluation of this program.

**Heat Illness Plan**

**Provision of water**

Employees shall have access to potable drinking water. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour for drinking for the entire shift. Employers may begin the shift with smaller quantities of water if they have effective procedures for replenishment during the shift as needed to allow employees to drink one quart or more per hour. The frequent drinking of water shall be encouraged.

**Access to shade**

Employees suffering from heat illness or believing a preventative recovery period is needed shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling for a period of no less than five minutes. Such access to shade shall be permitted at all times. Cooling measures other than shade (e.g., use of misting machines) may be provided in lieu of shade if practical.

**Preventing Heat Related Illness**

* Train employees to recognize the signs & symptoms of heat-related injuries.
* Use the buddy system (never work alone in hot areas) to monitor co-workers for heat stress.
* Dress for the heat. Wear lightweight, light-colored clothing. Light colors will reflect away some of the sun's energy. It is also a good idea to wear hats or to use an umbrella.
* Drink water and encourage workers to drink adequate replacement fluids. An average person should drink 1 1/2 gallons of water per day. (1 cup every 15 minutes). Salt pills or sports drinks with added salt are unnecessary as the typical American has enough salt in their diet. Drink continuously, even if you do not feel thirsty. Avoid alcohol and caffeine, which dehydrate the body.
* Supervisors should schedule tasks during cooler parts of the day and provide for alternate tasks when possible.
* Allow time for employee acclimation to hot environments.
* Slow down. Avoid strenuous activity. If you must do strenuous activity, do it during the coolest part of the day, which is usually in the morning between 4:00 a.m. and 7:00 a.m.
* Stay indoors when possible. Where practical, isolate, or even eliminate a source of heat and or humidity through environmental controls.
* Take regular breaks. Take breaks in a shaded area, or if possible, in an air-conditioned area. Cool fluids must be available during breaks.
* Encourage employees to maintain good physical fitness.

**Signs & Symptoms of Heat Related Illnesses**

Symptoms of Heat Rash

* Tiny blister-like red spots on the skin; pricking sensation, this is an early signal of potential heat stress. It is commonly associated with hot, humid conditions in which skin and clothing remain damp due to unevaporated sweat. Heat rash may involve small areas of the skin or the entire torso.
* Even after the affected area of skin is healed, sweat production will not return to normal for another 4 to 6 weeks. Treatments include cleaning the affected area and applying mild lotions to it. Keeping the skin clean and dry for at least 12 hours each day will prevent severe heat rash.

Symptoms of Heat Cramps

* Painful spasms of the leg, arm, or abdominal muscles due to heavy sweating, thirst can occur during or after hard work.
* Symptoms of Heat Exhaustion
* Fatigue, headache, dizziness, muscle weakness, loss of coordination, fainting, collapse
* Profuse sweating, pale, moist, cool skin; excessive thirst, dry mouth, dark yellow urine
* Fast pulse, if conscious
* Low or normal oral temperature
* May also have heat cramps, nausea, urge to defecate, rapid breathing, chills, tingling of the hands or feet
* Mood changes such as irritability or confusion, giddiness, slurred speech, irritability

Symptoms of Heat Stroke

* LIFE-THREATENING MEDICAL EMERGENCY
* Often occurs suddenly
* Headache, dizziness, confusion, irrational behavior, coma
* Sweating may slow down or stop
* Fast pulse, if conscious
* Rapid breathing
* Body Temp. Greater than 104 F
* May also have convulsions, nausea, incoherent speech, very aggressive behavior

**What To Do for Heat-Related Emergency**

* Call 911 (or local emergency number) at once, especially if a worker’s condition deteriorates.
* While waiting for help to arrive:
	+ - Move the worker to a cool, shaded area. Get inside air-conditioned buildings or vehicles.
		- Loosen or remove heavy clothing.
		- Wipe or spray his/her skin with cool water and fan him/her. You can use a piece of cardboard or other material as a fan.
		- Provide cool drinking water if possible

**Healthy Workplace Plan**

The company takes the health and safety of our employees very seriously. This Healthy Workplace Plan has been developed to help protect the operations and all personnel. The plan outlines the steps that the company will take to reduce the risk of airborne infectious diseases (such as seasonal influenza, H1N1, COVID-19, SARS) and transmission at the workplace. This plan provides some basics steps to follow if there is an infectious disease pandemic or endemic. Federal, state, and local requirements shall be followed in addition to these steps if those are implemented. These steps can also be followed to prevent the spread of other illnesses.

In order to control exposure and minimize the spread of an infectious disease, it is paramount that everyone plays their part. As outlined in this plan, all employees should practice good hygiene, housekeeping, social distancing, and other best practices identified below. All employees are expected to notify their supervisors if they experience symptoms of an infectious disease or become aware of others experiencing symptoms. There will not be retaliation for such reporting. If you have additional questions about this plan, please contact your supervisor.

**Knowing the Symptoms**

In order to identify potential spread of an infectious disease, all employees must be familiar with and watch for common symptoms which include:

* Coughing
* Fever
* Shortness of breath, difficulty breathing
* Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose

Other symptoms may present themselves depending on the infectious disease and all employees should make themselves aware of all symptoms. Any employee exhibiting these symptoms should discuss this with their supervisor who may inform them not to report to work. Any employee who begins to experience these symptoms while at work must notify their supervisor and may need to leave the workplace.

**General Requirements**

* Observe posted jobsite rules, these include social distancing requirements, disinfecting and hygiene practices.
* Restrict access to any site office/main office, handle communication with site personnel over the phone or via email.
* Follow posted jobsite plans for recommended paths of travel, maximum occupancy in enclosed areas, and any additional PPE requirements.
* Do not proceed to any part of the project that is posted as off limits to non-essential personnel if not identified as essential personnel.
* Delivery drivers should remain in their vehicles whenever possible.
* Stay home if you are sick (showing signs or symptoms).
* Wear face covering or mask over nose and mouth to prevent spread of virus, where required.

**Social Distancing**

* Workers should attempt to maintain 6’ between each other. For tasks requiring proximity closer than 6’, other measures shall be taken such as facing away from each other, limiting contact within 6’ to 10 minutes or less and use of additional PPE such as face shields.
* Whenever feasible, reduce the size of work crews and minimize the number of people needed to perform the task safely.
* Do not congregate in groups anywhere including in offices, common areas, break areas, etc. Meetings shall be held over phone or video whenever possible. If necessary, hold in person meetings outdoors.
* When engaging other employees or workers, do so while maintaining the required distance. If the situation does not permit this, e.g. high noise levels, do not approach. Communicate the necessary information to your site supervisor after you leave the area.
* Avoid carpooling if possible. It is recommended that all employees use their own vehicles for transport to and from the jobsite or office.
* Stagger shifts, breaks, or lunch hours to maximize production and spacing but minimize staff social interaction.

**Hygiene**

* Clean commonly touched surfaces in your work area frequently.
* Provide hand hygiene and sanitation stations to be readily available to all persons on the jobsite.
* Wear standard required PPE, including eye protection and gloves. Use of respirators should be limited to specific activities for which they are typically needed.
* Do not share PPE.
* Avoid shaking hands, horseplay or physical contact.
* Avoid unnecessary contact with high contact areas such as door handles and handrails.
* Avoid sharing or handling other people’s tools, electronics, office supplies.
* If feasible, equipment operators should use the same piece of equipment every shift.
* Avoid touching your face.
* Cover your cough or sneeze with a tissue and throw it away immediately.
* Wash hands often with soap and water for at least 20 seconds or use an alcohol-based hand sanitizer with at least 60% alcohol.
* Avoid congregating while eating. Do not share food.
* Do not setup/use community drinking stations. Use individual drinking bottles instead.

**Enforcement Policy**

All employees must understand that THE FIRST AND MOST IMPORTANT RESPONSIBILITY IS TO BE RESPONSIBLE FOR ONE's OWN SAFETY! Disregarding safety and health guidelines provided for one's own benefit is not only dangerous to oneself, but also to those with whom one works. An employee who disregards safety is a significant liability to the company. The company safety guidelines apply to all employees of the company, without exception. The company safety guidelines will be enforced by management. Warnings and reprimands will be issued for known violations of the safety guidelines as soon as the infraction is observed, and it will become part of an employee's work record.

The following steps should be taken if an employee is found in violation of safety and health guidelines and OSHA standards:

1. **1st Offense:** The employee will be removed from hazardous situation immediately. Supervisor will formally write up the employee using the employee disciplinary action form. Supervisor will re-train the employee and document this training on the disciplinary action form. Future discipline will be discussed with the employee.
2. **2nd Offense:** The employee will be removed from hazardous situation immediately. If an employee is found in violation of a safety and health guideline or OSHA standard that is substantially similar to the 1st offense, the supervisor will formally write up the employee using the disciplinary action form. The employee will then be sent home, without pay for the remainder of the day. Upon return to work the next day, the supervisor will re-train the employee and document this training on the disciplinary action form. Future discipline will be discussed with the employee.
3. **3rd Offense:** The employee will be removed from hazardous situation immediately. If an employee is found in violation of the same or substantially similar rule, the supervisor will formally write up the employee using the disciplinary action form. The employee will be suspended without pay for at least 3 days. The employee will not be allowed to return to work until cleared by management. Management reserves the right to terminate employment at this time.

Willfully Violating Safety Rules—any employee who refuses to work safely, or to observe company safety and health guidelines, who refuses to wear proper protective equipment, or who fails to obtain proper permits, where required, or fails to observe required procedures, will be subject to verbal and written warnings resulting in disciplinary action, which may lead to termination of his or her employment with the company. The severity of disciplinary action will be determined by the frequency and severity of infractions, and may include reprimand, time off without pay, or termination. Willfully endangering one's life or the life of another person is gross misconduct and may be cause for immediate dismissal.

**Communication & Coordination**

Communication and coordination with other contractors is vital to our safety & health program. Supervisors shall discuss any site-specific safety requirements with other contractors such as Home Builders, General Contractors, Temporary Staffing Agencies, etc.

**Subcontractor Safety Management**

As part of our Safety & Health Program, the subcontractor to the company must abide by certain requirements on our jobsites. It is our goal to ensure all workers continuously work safe and the appropriate oversight is present on each of our jobsites. All subcontractors shall ensure OSHA requirements are being met. Non-compliance with OSHA rules will result in reprimands up to contract termination. Before starting work, management should ensure that subcontractors are qualified via documentation review of the following:

* Subcontractor insurance policy
* Subcontractor safety program or similar plan
* Subcontractor safety training documentation
* Subcontractor safety statistics
* Previous OSHA citations
* Injuries/Accidents

Subcontractors should not be allowed to work on our jobsites if they don’t meet these requirements.

**Emergency Action Plan**

**Emergency Procedures**

If an emergency occurred on our jobsite, employees should know how to handle certain situations. Basic procedures are as follows:

* TAKE COMMAND—Assign the following duties to specific personnel.
* PROVIDE PROTECTION—Protect the accident scene from continuing or further hazards—for example: traffic, operating machinery, fire or live wires.
* GIVE FIRST AID—Give first aid to the injured as soon as possible.
* CALL AN AMBULANCE—Call an ambulance and any other emergency services that are required.
* GUIDE THE AMBULANCE—Meet and direct the ambulance to the accident scene.
* GET THE NAME OF THE HOSPITAL—For a follow-up, find out where the injured person is being taken,
* ADVISE MANAGEMENT—Inform senior management. Management can then contact relatives, notify authorities, and start procedures for reporting and investigating the accident.
* ISOLATE THE ACCIDENT SCENE—Barricade, rope off or post a guard at the scene to make sure that nothing is moved or changed until the authorities have completed their investigation.

**Medical Emergencies**

* Call 911 to contact Emergency Medical Services (EMS).
* Unless trained, do not attempt to render any first aid.
* Do not attempt to move an injured person.
* Limit your communication with the ill or injured person to quiet reassurances.
* After the person's immediate needs have been taken care of, remain to assist the investigating officer with pertinent information about the incident.
* If the victim is an employee, the victim's supervisor should fill out the accident investigation report and first report of injury.
* Planning for such emergencies includes being trained in emergency first aid procedures and CPR.

**Fire Emergencies**

In the event of a fire:

* Notify personnel in the room/area of the fire to evacuate immediately.
* Pull/activate the nearest fire alarm box if available.
* Call the Fire Department by dialing 911.
* Turn off any gas being used.
* Confine hazardous materials in cabinets.
* Walk to the nearest stairwell/exit and evacuate the building.
* DO NOT USE ELEVATORS.

**Chemical Emergencies**

In the event of a chemical spill:

* Notify personnel in the room/area of the spill to evacuate immediately.
* Close windows and doors to the room/area of the spill and evacuate.
* Call 911 and report the spill to the Fire Department.
* Remove clothing and wash all parts of the body, which may have come in contact with the chemical using copious amounts of water.
* All personnel who may have been contaminated by the chemical should report to and remain in one safe location until the arrival of the Fire Department. This will decrease the chance of contaminating other personnel and other areas.
* Do not re-enter the room/area until the appropriate safety officials have determined that the area is safe to re-enter.

**Tornado Watches & Warnings**

* When a tornado *watch* is announced, this means that conditions are right for the formation of tornadoes.  Keep your radio, television, or NOAA weather radio tuned to a local station for updated information and advice from the weather service.
* When a tornado *warning* is issued, this means a tornado has been sighted in your vicinity and you should take cover immediately.
* Seek shelter in steel frame or reinforced concrete building.  Go to the basement or interior hallway on the lowest level.  Closets or bathrooms in the center of the building offer the greatest protection.
* Always stay away from the windows, exterior walls, and exterior doors.
* Avoid auditoriums, gymnasiums and large lecture-type rooms.
* If you are in a vehicle, *do not* try to outrun a tornado.  Leave your vehicle immediately.  If you cannot find shelter in a building, lie flat in a ditch, culvert or the lowest area.   Cover the back of your head with your hands.
* After the tornado passes, be very cautious.  Watch for downed power lines, broken gas lines, broken glass, etc.

**Earthquakes**

* Stay calm.  Don't panic.  Stay where you are.  If outside, stay outside.  If inside, stay inside.  Most injures occur as people are entering or leaving buildings.
* If an earthquake strikes while you are indoors, take cover under a desk, table, bench or against an inside wall or in an interior doorway.  Stay away from windows and exterior doors.
* If you are in a high-rise building, use the stairway rather than the elevator; there may be a power failure and you could become stuck in the elevator.  Don't' be surprised if fire alarms or sprinklers are activated.  If you must leave the building, choose your exit carefully.
* If you are in a moving vehicle, stop as quickly as safety permits, but remain in your vehicle.  Your vehicle may shake, and you are better off remaining in your vehicle until the shaking stops.  Avoid stopping near or under buildings, overpasses, and utility wires.
* If you are outside, move away from buildings and utility wires.  Remain in an open area until the shaking stops.
* After an earthquake, check for injuries.  Do not attempt to move a seriously injured person unless they are in immediate danger of further injury.  Call 911 for assistance.
* Don't re-enter buildings until emergency response personnel advise it is safe.
* Be prepared for aftershocks (additional shaking.)

**Bomb Threat**

In the event of a bomb threat or an explosive incident:

* Engage caller in conversation.
* Be calm and, if possible, take notes of the conversation.
* Try to determine:
	+ The exact location of the bomb.
	+ The source of the threat.
	+ Time of the explosion.
	+ Background noises on the phone.
	+ Qualities of the caller’s voice.
	+ Sex and approximate age.
* If possible, have someone listen in on the call.
* Check caller ID or dial \*69 to determine where call originated.
* Call the Police by dialing 911.

**OSHA RECORDKEEPING & REPORTING**

**OSHA RECORDKEEPING**

OSHA requires companies to keep logs of certain injuries and incidents. Siding contractors with more than 10 employees are required to keep a record of serious work-related injuries and illnesses. Minor injuries requiring first aid only do not need to be recorded.

**What Records are Kept?**

* OSHA 301: OSHA requires employers to record the injury or illness using an OSHA 301 form or equivalent.
* OSHA 300 Log: this is an annual log of recordable injuries and incidents. The information from the OSHA 301 must be recorded on this log within 7 days.
* OSHA 300a Summary: this summary form will be completed each year. Facilities must post this form in a prominent location from February 1st to April 30th each year.

All these forms, referred to as OSHA Recordkeeping Logs can be found in the forms section of this program.

**Maintaining and Posting Records**

The records must be maintained at the worksite for at least five years. Annually from February 1st through April 30th, employers must post a summary of the injuries and illnesses recorded the previous year. Also, if requested, copies of the records must be provided to current and former employees, or their representatives. In addition, if these records are requested during an OSHA inspection, they must be provided within 4 hours.

**Electronic Reporting**

OSHA also requires siding contractors whose establishment size is 20+ employees to electronically report some of these records to OSHA. The 300a Summary Form is required to be electronically submitted to OSHA by March 2nd of the following year. These records can be reported here: <https://www.osha.gov/injuryreporting/ita/>

**OSHA Reporting**

Severe injuries must be reported to OSHA. Here are the requirements:

* Fatalities: reported within 8 hours
* Hospitalizations, amputations and/or loss of eye: reported within 24 hours

This information can be reported to your local OSHA area office, or by calling 1-800-321-6742. There is also an online tool that can be used to report these injuries to OSHA: <https://www.osha.gov/pls/ser/serform.html>

**INCIDENT INVESTIGATION**

Incidents should be investigated to determine the cause and prevent future occurrence. These incident investigation procedures provide an approach to determine initiating events, contributing events, root cause, and contributing causes. The investigation must identify appropriate recommendations that address the problems and identify root causes. These may include, but are not limited to, engineering controls, personal protective equipment, and or training for affected employees.

**Policy**

All safety incidents, including work-related injuries, accidents, regulatory violations, and near misses, will be investigated to determine the root causes. Recommendations will be developed and implemented to prevent recurrence of the accident/incident. (A near miss is a condition or an incident where injury or property damage could have occurred.)

**Roles and Responsibilities**

Management

1. Review all OSHA recordable injuries, vehicular accidents, accidents involving property damage, and near miss events to assess cause and prevention.
2. Report any reportable event that occurs to an employee of the company to OSHA.
3. Require any subcontractors who have a reportable event on a company jobsite to report the issue to OSHA.
4. Monitor corrective actions as appropriate.
5. Ensure correct documentation and report results of the incident investigation, including findings and recommendations to upper management.
6. Notify field and office personnel of the event.

Supervisors

1. Immediately report accidents and near miss incidents to the management.
2. Perform an initial investigation, and timely submit Accident/Injury Reports and Near Miss Incident reports to the management within 24 hours.
3. Review all accident/injuries and assess corrective action(s) and the need for safety modification and/or employee training.

Employees

1. Immediately inform supervisors of accidents, near miss incidents, unsafe conditions and unsafe practices.
2. Do not disturb area, but control area to allow for investigation.
3. Participate in the incident investigation.

**Investigation Procedures**

All incidents are to be investigated in a timely manner to determine the root cause(s) and contributing factors involved. The extent of the investigation will be dependent upon the severity or potential severity of the incidents.

Supervisors are responsible for performing an initial investigation immediately upon finding out about the incident to determine the root cause(s) of the incident. Management will be contacted as needed to assist in the completion of the investigation. The purpose of the investigation is not to fix or find blame, but to identify the root cause and determine preventative measures than can help to prevent future accidents/incidents.

|  |
| --- |
| **Investigative Steps** |
| 1. Provide for immediate medical attention (if needed)
 |
| 1. Secure area to preserve accident scene
 |
| 1. Report the incident to management
 |
| 1. Assemble and complete necessary reporting and investigation forms
 |
| 1. Interview injured personnel and witnesses
 |
| 1. Examine the accident work area for causative factors and take pictures
 |
| 1. Review established procedures to ensure they are adequate and were followed
 |
| 1. Review training records of affected individuals
 |
| 1. Determine all contributing causes to the accident
 |
| 1. Take corrective actions, in consultation with management
 |
| 1. Record all findings and actions taken or to be taken
 |
| 1. Communicate “lessons learned” in safety training/meetings
 |
| Note: The guidelines listed provide a checklist for the initial investigation. Additional or modified steps should be used as appropriate to the situation. |

The supervisor’s initial findings and any immediate corrective actions must be documented on the appropriate forms and sent to management within 24 hours of notification of the incident.

The supervisor should work with management to establish action deadlines. Corrective actions must be enacted according to the plan.

Forms used for investigations are found in the forms section of this program.

**OSHA INSPECTIONS**

These basic procedures can be used to assist during an OSHA inspection. It is best to plan and be ready for an inspection at any time.

**Arrival of the Compliance Officer**

* Verify the Compliance Officer's credentials—look at ID and business card.
* Ask the Compliance Officer to wait for management to arrive per company policy.
* Call management.

Management is ultimately responsible for giving permission for OSHA to inspect. It is not advisable to tell OSHA they cannot inspect your site. OSHA should wait a reasonable amount of time onsite prior to starting the inspection to allow your management or their representatives to arrive onsite.

The following is to be done when the OSHA inspector conducts the inspection.

* Request an opening conference if the Compliance Officer does not call for one.
* Have the supervisor present.
* Take detailed notes of everything discussed.
* Be cooperative with the Compliance Officer. At all times prior to, during and after the inspection act in a professional businesslike manner. Never enter into personal arguments with the Compliance Officer.

**Walk Around Inspection**

* Always have a company representative accompany the Compliance Officer.
* Take detailed notes of everything seen, discussed, and conducted by the Compliance Officer.
* Take photographs of everything the Compliance Officer photographs. If the equipment, work area, etc., can be photographed from a more favorable position (different angle, greater distance, etc.) photograph it from the different position.
* Do not volunteer any information. The Compliance Officer is trained to obtain admissions from companies. Be careful answering questions. When in doubt, ask them to restate the question. Do not admit to a violation. State the facts only, not your opinion. Do not lie to the Compliance Officer at any time.
* Ask the Compliance Officer that you would like him/her to advise the company of all suspected violations and the standard involved. Inform the Compliance Officer that you will be taking notes of the suspected violations he/she informs you of so that there will be no dispute as to whether the company was informed.

**OSHA INTERVIEWS**

OSHA may want to interview multiple individuals during the inspection. The following rules should be followed when being interviewed by OSHA.

Rules for Being Interviewed

1. Tell the Truth
2. Make sure you understand the question
3. Just answer the question, nothing else
4. Answer based on your knowledge only …don’t guess or speculate

Employee Interviews

* The Compliance Officer may interview any employee privately.
* For interviews held with employees in our presence, record the names and companies of all employees interviewed. Record the content of the conversations with the employees.
* We have the right to be in attendance with management personnel.

**Closing Conference**

* Have the designated company representative present for the closing conference.
* Take notes of everything discussed.
* Make sure that no questions you have concerning the inspection go unanswered.
* Don't give any estimates of abatement time needed to correct any alleged violations.

**After the Closing Conference**

* Prepare a detailed report of your inspection notes. Include photos and any other relevant information. Send report to your management.
* Keep all notes and pictures taken on file.