TURNER RISK MANAGEMENT

Corporate Environmental, Health and Safety Policy

Turner

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Environmental, Health & Safety Policy

Turner's safety culture is reflected in the principle of Building L.I.F.E. (Living Injury Free Everyday) with an expectation that all projects provide the safest workplace possible for our employees, contractors, clients and members of the communities in which we work everywhere, every day.

We expect our contractors to meet their contractual obligations of performing safe work, and to promote a culture within their own organization that aligns with the Turner ideal, executing work safely at every project every day.

Our history has demonstrated that the more aligned our business partners are with the principle of Building L.I.F.E. rather than regulatory compliance, the safer and more successful the project outcome.

Turner's Building L.I.F.E. safety program is a continuous improvement process with a focus on upstream risk avoidance and the activities which produce risk. The Building L.I.F.E. process seeks to increase frontline worker engagement in the safety and planning processes through engaging those closest to the risk in the decision making process. Building L.I.F.E. is anchored by a focus on positive reinforcement and feedback on safe behaviors by everyone involved in the delivery of the project. The Building L.I.F.E. model promotes teamwork and proactive safety engagement by everyone.

The guiding principles of Building L.I.F.E. are:

- Injuries are Preventable
- Perform a Job Only if it is Safe
- Working Safely is a Condition of Employment
- Practice and Expect Safe Behavior Everywhere, Everyday

It is Turner's expectation that everyone is responsible and accountable for the safe performance of work. If anyone sees something that is unsafe, or someone performing work in an unsafe manner, it is their responsibility to do everything they can to stop the activity. If they are not able to do so, it is their responsibility to immediately bring the situation to the attention of a person with authority to eliminate the danger.

Thank you for your support and help maintaining a workplace that promotes the Building L.I.F.E. culture. Together, we will continue to improve our performance and make our projects the safest possible.

Peter J. Davoren
President and Chief Executive Officer
Turner Construction Company

Turner

Section 2

TURNER RISK MANAGEMENT

CORPORATE ENVIRONMENTAL,

HEALTH & SAFETY POLICY

Administration & Programs

Crisis Management Plan

I. Policy Statement

Turner's Crisis Management Plan provides an outline of actions that must be taken to prepare for a crisis and response plan in the event of a crisis. The plan defines the action steps necessary and the responsibility assigned for such actions. A crisis is any event that has created and/or may still pose an immediate threat to life, property or business as usual. This may occur at a jobsite, a Business Unit office or other locations related to our business.

Such situations may include, but are not limited to:

- Incidents involving serious bodily harm and/or deaths, or physical damages,
- Bomb threats, terrorist attacks,
- Collapse of a building or portion of a building,
- Earthquake, hurricane, tornado,
- Fire/explosion,
- Equipment failure such as the collapse of a crane,
- Workplace violence ,
- Environmental exposures,
- Extreme Business Interruption,
- Pandemic Illness,
- Immigration.

II. Procedures

1. The following are highlights of the Crisis Management Plan and may be found and viewed in detail in the Safety Section of the SharePoint Document Management System.

   a) Section 1 – General
   - The severity of the event will dictate the appropriate response. Your Business Unit Safety Director (BUSD) and Operations Manager must be contacted before calling in a crisis using the National Crisis Number, 1-866-3-TURNER (1-866-388-7637).

   b) Section 2 – Preparing for a Crisis
   - The key to success in handling a crisis situation is preplanning, prior preparation, organization, and rehearsal / practice drills.
   - Each project and office must have pre-determined Action Teams that are ready to react to any crisis situation.

   c) Section 3 – Event Response Plans
   - Several immediate and simultaneous actions must take place during a crisis regardless of the type of event.
   - These actions should be directed by the Project Superintendent or, in his/her absence, the Project Safety Manager. Again, it is important to notify your BUSD and Operations Manager before contacting the National Crisis Number, 1-866-3-TURNER (1-866-388-7637). The Site Specific Crisis Plan will detail the actions needed.

d) Section 4 – Media Management

- All inquiries by the media should be referred to the General Manager or Operations Manager.
- Turner's Corporate Public Relations Group must also be contacted immediately by the Operations Manager or General Manger of the Business Unit.

e) Section 5 – Crisis Preparedness Checklist

- Turner's level of preparedness for a crisis prior to its occurrence will determine the success of effectively managing such an event.
- Crisis practice drills must be conducted semi-annually for project sites and offices. These also should occur at the start of every project.
- Checklists provided on SharePoint will assist in drill preparation.
- Projects should utilize posters, wallet cards, etc. to maintain a level of awareness and preparedness for any crisis that may develop. They are available on the Safety SharePoint site on the right hand side under Safety links and clicking on the Turner EH&S store.

EMR Policy

I. Policy Statement

In our ongoing efforts as the leader in construction safety, Turner has adopted the following policy to ensure that Subcontractors with the best safety performance are contracted to work with us. Subcontractors who have an EMR greater than 1.0 will not be allowed to bid or be awarded work for Turner. This policy applies to all secondary tier subs as well. For projects where Turner doesn't hold the agreements, we should recommend the same policy to the Owner, but the final decision is obviously the Owner's.

II. Procedures

1. In rare occasions, Turner may issue a waiver to this policy. A one-page waiver request is available from Business Unit Purchasing Managers or Business Unit Safety Directors.

2. Every EMR waiver request must be submitted to the Business Unit Safety Director and Business Purchasing Manager prior to submittal to the Corporate Safety Director for approval.

3. Every EMR waiver request must contain a specific Risk Mitigation Action Plan to ensure the subcontractor can perform the scope of work without incident. The Business Unit Safety Director and the Purchasing Manager are responsible for developing the plan.

4. If a Subcontractor has been given a waiver based on his current published EMR and the BU wants to award another subcontract to the Subcontractor in the same EMR year, no additional waiver is required as long as the Business Unit Safety Director (BUSD) and Purchasing Manager agree that the Subcontractor's safety performance is meeting their expectations. The scope of work must be similar and the value of the project must be within 50% of the original Subcontractor Approval Request (SAR) value.

5. The S.A.R. will indicate "see attached previously approved EMR waiver in place" and the previous waiver will be attached to the S.A.R. The same safety measures from the initial waiver will incorporate in future awards.

6. Once the Subcontractor's new EMR is promulgated, if it increases from the previous year, the waiver process starts over. If it decreases, the old EMR waiver may be used providing that the Purchasing Agent and Safety Director review the updated OSHA 300 and 300A's to confirm that the EMR Waiver Risk Mitigation Plan is still valid and does not need to be adjusted based on trending information from the OSHA 300 Logs. If no adjustment is needed, no further approval is required outside of the Business Unit.

7. Each new waiver request must be accompanied with the S.A.R., the OSHA 300 and 300A Forms for the previous 3 years, a Risk Mitigation Action Plan for the Subcontractor on this project and letter(s) from their insurance broker confirming the past three years EMR's and incidence rates and what they are doing to help the subcontractor improve their performance.

8. The subcontractor must clearly submit in writing what they will be doing to lower their EMR to acceptable levels.

9. If the Subcontractor is not going to be onsite, except for supervisory oversight and the onsite installer has an EMR less than 1.00, then no waiver is necessary.

III. Roles and Responsibilities

1. Turner Purchasing Manager & Safety Director:

   a) Must ensure EMR policy is adhered to and all processes for waivers are followed prior to subcontractor selection.

   b) Must develop a risk mitigation plan, ensure it is in the subcontract, and conduct pre-planning meetings. They must require the use of Job Hazard Analysis (JHA) and Pre-Task Planning (PTP) meetings.

2. Subcontractor Management:

   a) Must comply with and furnish materials necessary to comply with Turner policy.

   b) Must attend and participate in project orientations.

   c) Must participate in any and all required pre-planning meetings, JHA's and PTP meetings.

Mold and Moisture Remediation Policy

I. Policy Statement

Turner is not in the business of performing mold abatement or remediation work.

Turner Construction Company's Mold Taskforce was established to develop suggested practices to assist and provide guidance to the Business Units in connection with possible mold contamination. The taskforce has developed specific protocols to guide Turner Project Staff regarding mold, including the remediation process. All documents and forms are located in the Claims & Legal folder on the TKN Document Management System (TKN/Claims &Legal/Site Documents/Policy & Guideline /Business Unit Mold Suggested Practices).

The suggested practices begin once mold has been detected in the building and continue through complete remediation. The key to these practices is rapid response with prudent and reasonable judgment made depending on each situation.

II. Procedures

1. Initial Identification and Assessment – Once mold has been discovered, the business unit is to investigate, document and identify the problem and assess the magnitude of the situation. **An initial call must be made to The Business Unit Safety Director and Claims Manager.**

2. Notification – All communications shall be legally protected by addressing the correspondence to Peckar & Abramson and copying only those with a need to know.

3. Remediation Evaluation – Working in conjunction with Turner Risk Management the project team and Operations Manager should determine the level of remediation needed and the need for external expertise.

4. Evaluate Responsibility – It is critical that the source of the mold is determined and a root cause is identified. The Project Team, Operations Manager, and Turner Risk Management will determine what caused the mold contamination and what parties are responsible for the remediation.

5. Parties on Notice – As soon as reasonably possible, the BU Claims Manager shall place the culpable parties on notice. Refer to Turner's Purchasing Manual for guidance in 24 hour and 3-day notice letters per Subcontract Form 36. The Project Manager must notify the subcontractor that Turner is proceeding to have the mold problem corrected and that the subcontractor will be held accountable for the cost. Specific details can be found in the Claims and Legal folder on TKN titled "Tender Letter Protocol for Mold" (TKN/Claims & Legal / Site Documents / Correspondence / Mold Tender Letter). This document provides guidance on how to protect our interest relative to contractual indemnification and additional insured status.

6. Crisis Management – Depending on the extent of contamination, there may be a need for public relations involvement to minimize exposure.

7. Remediation Protocol – The Project Team manages the remediation of the mold with either a consultant and / or remediation contractor. **Specific details can be found at the Claims and Legal folder on TKN titled Mold Protocols 2 (TKN /Claims & Legal/ Best Practices & Lessons Learned / Mold Additional Protocol Levels).**

8. Closing Report – Maintaining Legal Privilege, complete Interim Mold Closing report and Forward to Peckar and Abramson and Turner Risk Management.

A comprehensive sample Moisture Control Plan Guideline is available in Appendix B of this manual.

Spill Prevention Control Policy

I. Policy Statement

As the leader in the construction industry, Turner Construction Company is committed to the prevention of unwanted chemical releases, specifically related to potential entrainment into ground water sources. It is our intention to provide and maintain the best possible work conditions to ensure the minimization of potential spills. This will be achieved through the continued implementation of our Spill Prevention Control Plan (SPCP). By promoting safe and efficient production and by minimizing all incidents that could increases cost to the project and potentially impact the environment. It is our belief that with complete cooperation from all workers, the SPCP program will continue to achieve commendable results.

This Spill Prevention Control Plan has been prepared by Turner Construction Company to assist projects in managing hazardous substance spills including, but not limited to, oil and other petroleum products. The SPCP is to be used to inform contractors of the potential hazardous materials, contamination prevention measures, emergency spill response, and responsibilities associated with hazardous materials during construction.

II. Procedures

1. Spill Prevention And Containment Measures

   The number one defense against a spill is prevention. The easiest way to prevent spills is to: conduct proper vehicle maintenance and inspections; never place vehicles or equipment in or near sensitive environments; store all materials in protected and approved areas; store all chemicals in approved and labeled containers and follow the OSHA hazard communication standard / GHS; and train workers on the proper storage, handling and treatment of all hazardous chemicals on the project.

   This section identifies the types of secondary containment or diversionary structures that will be used to handle spill sources.

   a) Contaminated Soil**:** An equipment leak from a fuel tank, equipment seal, or hydraulic line will be contained within a spill pad placed beneath potential leak sources. An undetected leak from parked equipment will be contained within the equipment staging area by removing the soil to a drum using a shovel or by installing a temporary berm.

   b) Equipment Staging Area and Material Staging Area: An equipment leak from a fuel tank, equipment seal, or hydraulic line will be contained within a spill pad placed beneath potential leak sources. An undetected leak, from parked equipment will be contained within the equipment staging area by removing the soil to a drum using a shovel or by installing a temporary berm.

   c) Fuel Staging Area: A spill during fueling operations will be contained within a spill pallet for small container handling or secondary containment berms. The transfer of fuel into portable equipment will be performed using a funnel and/or hand pump and a bucket or containment pan will be placed directly underneath the fueling operation to prevent any incidental spills or drips. A spill response kit will be located near the fueling area for easy access. The spill response kit

will include plastic sheeting, tarps, absorbent pads, Lite-Dri absorbent (or equivalent) and shovels.

d) Unknown soil and groundwater contamination: When contaminated soil is encountered, refer to the Environmental Policy section of the Safety, Health and Environmental Policy.

e) Underground pipelines: If a leaking underground pipeline is encountered, the leaking material will be contained within the excavation. Turner Project Staff will contact Risk Management immediately.

III. Roles and Responsibilities

1. A project specific Spill Prevention Plan shall be developed and posted in the project Trailer prior to mobilization. A comprehensive sample Spill Prevention and Control Plan is available in Appendix C of this manual. This plan shall include the following:

   i. Roles Responsibilities for Owner, Turner, Subcontractors, and Vendors.
   ii. Formal inspection protocol and archiving procedures.
   iii. Emergency procedures following a spill.
   iv. Spill Containment Equipment List & Sourcing information.
   v. Local Emergency Response Contact Information.
   vi. Project Specific Hazardous Materials Communication.

2. The project specific Spill Prevention plan shall be communicated to all Turner Project staff and key subcontractor personnel.

Handheld Unit Use Policy

Turner Construction Company recognizes that our employees are our most valuable assets and the most important contributors to our continued growth and success. We are not only concerned about your welfare as a Turner employee, but also the welfare of others who could be put in harm's way by inattention to the task (driving, operating equipment, etc.). We are therefore firmly committed to providing a safe work environment for all workers and set forth this policy for safe use of Mobile Handheld Units* while driving.

*Mobile Handheld Units are handheld devices, including cell phones, iPhones, Androids, Blackberries, pagers, MP3 players (or equivalent), radios, and other communication devices.

Purpose:

Driver inattention is a factor in the majority of motor vehicle accidents. Researchers at the University of Toronto found the risk of having a collision while using a mobile handheld unit or similar device is the same as driving while intoxicated. Several states and cities already prohibit the use of mobile handheld units without a hands-free device while driving and many more states will follow suit.

For these reasons, effective immediately, Turner Construction Company employees are prohibited from using mobile handheld units without a hands-free device (defined as vehicle mounted or headset ear clip) while driving on company time or while conducting Turner business. This Policy includes all calls made from the following types of vehicles on or off all Turner jobsites.

1. Vehicles provided by Turner Construction Company including:

   - Leased vehicles with or without a Turner decal;
   - Golf carts and similar vehicles used for jobsite transportation;
   - Construction equipment to include cranes, scissor and aerial lifts, earthmoving, hauling, and excavating equipment, except for radios, when radios are the primary means of controlling the operation of the equipment..

2. Turner employee personal vehicles if the employee is receiving a vehicle allowance and/or the employee has been issued a company telephone.

Procedures/Expectations:

A driver's first responsibility while on company time or while conducting Turner business, on or off a jobsite, is the safe operation of the vehicle. The Policy should be followed accordingly.

Hands-Free Devices

Hands-free operation does not guarantee 100% safety but will provide drivers with less distraction.

1. Always use the appropriate hands-free device for your Mobile Handheld Unit. For telephones issued by the company, an appropriate hands free device will also be issued at company expense or the individual reimbursed for its purchase.

2. Use the Mobile Handheld Unit's speed dial and voice activated functions.

3. Turner employees should keep all calls while driving brief, and should end any call that distracts them from the road.

4. Inform regular callers of the best time to reach you based upon your driving schedule.

5. If a hands-free device is not available:

   - Do not use the Mobile Handheld Unit; send calls to voicemail, forward them to another number or turn off the unit.
   - Pull off the road to a safe location to make or receive a call or ask a passenger to make or take the call.

6. Never take notes, type, refer to maps, input information into a global positioning system (GPS), or any materials while operating a vehicle.

7. Check state requirements and follow the law. Example: In California, if you are punching a button, and therefore taking your eyes off the road, you are in violation of the law.

Acknowledgement and Warnings

All employees issued company telephones will be required to sign an acknowledgement that the use of a Mobile Handheld Unit without a hands-free device is prohibited while driving. This acknowledgement can be found on TKN at the Technology Services site and in The Turner Corporation-Technology Use Policy.

NOTE: Any employee charged with traffic infractions as a result of the use of a Mobile Handheld Unit will be personally responsible for paying fines and any other associated costs just as they are for any other parking violation or moving traffic offense.

This mobile handheld device use policy is intended to reduce the likelihood of motor vehicle accidents. It may not prevent all motor vehicle accidents from occurring. It does not address potential compliance issues with Federal, State, local OSHA or any other regulatory agency standards. Nor is it meant to be exhaustive or construed as legal advice.

Hazard Communication Policy

I. Policy Statement

OSHA's Hazard Communication Standard, also known as HAZCOM, is now aligned with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals, and requires each employer to establish a hazard communication program. GHS is based on major existing systems around the world, including OSHA's Hazard Communication Standard and the chemical classification and labeling systems of other international and US agencies. The result of the collaboration is a document called "The Purple Book." OSHA has modified the Hazard Communication Standard (HCS) to adopt the GHS to improve safety and health of workers through more effective communications on chemical hazards. This program must provide a means to inform employees about the hazards associated with chemicals that they may be exposed to in the workplace. Turner's Hazard Communication Program (HCP) has been established to comply with this standard by ensuring that hazards associated with chemicals in the workplace are communicated to all employees who may be exposed to them. The Turner HCP applies to all employees (Turner, Contractor, and Subcontractor employees) who perform work on projects managed by Turner. The communication of potential hazards associated with chemicals and hazardous materials in the work place shall be accomplished by means of implementing the following practices on each job site:

1. A written hazard communication program,
2. Use of container labeling,
3. Availability of Safety Data Sheets (SDS),
4. Maintenance of an on-site Chemical Inventory,
5. Employee training.

II. Procedures

A. Written Hazard Communication Program - Each Business Unit shall include the Turner HCP in its safety program and ensure that a site - specific HCP is provided for each job. The jobsite program document must describe the manner in which labeling, SDSs and employee training requirements will be satisfied. The BUSD shall assist the Project Staff with development of this program.

B. Chemical Inventory List - A list of chemicals known to be present on the jobsite will be compiled by the Turner Project Staff. This list will be maintained in the Turner project office and will be updated on a monthly basis. The list of the hazardous chemicals must be assigned a unique product identifier (i.e. number scheme) that can be cross-referenced on each corresponding SDS. Each subcontractor will submit an updated Chemical Inventory List to the Turner Project Staff.

C. Safety Data Sheets (SDS) – The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Safety Data Sheets or SDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format. The Turner Project Staff will be responsible to obtain and maintain the on-site file of all SDS's supplied by each Subcontractor. Turner project staff should coordinate the exchange of SDSs between the subcontractors when requested. SDS information should be for materials specific to the site. SDSs shall be accessible to all employees on-site. Chemical manufacturers, importers, distributors, or employers who become

newly aware of any significant information regarding the hazards of a chemical shall revise the labels for the chemical within six months of becoming aware of the new information, and shall ensure that labels on containers of hazardous chemicals shipped after that time contain the new information. As part of the GHS, all SDS's will be uniform in appearance and must contain the following sections:

a) Section 1. Identification
b) Section 2. Hazard(s) identification
c) Section 3. Composition/information on ingredients
d) Section 4. First-Aid measures
e) Section 5. Fire-fighting measures
f) Section 6. Accidental release measures
g) Section 7. Handling and storage
h) Section 8. Exposure controls/personal protection
i) Section 9. Physical and chemical properties
j) Section 10. Stability and reactivity
k) Section 11. Toxicological information
l) Section 12. Ecological information
m) Section 13. Disposal considerations
n) Section 14. Transport information
o) Section 15. Regulatory information
p) Section 16. Other information, including date of preparation or last revision

D. Container Labeling – A hazard classification will be completed by the manufacturer and the following information is to be provided for each hazard class and category. Labels will require the following elements:

a) Product Identifier (Ingredient Disclosure),
b) Signal words,
c) Hazard Statement,
d) Pictograms,
e) Precautionary Statements,
f) Supplier Identification,
g) Supplemental Information.

Secondary Container Labeling - Employers may choose to label workplace containers either with the same label that would be on shipped containers for the chemical under the revised rule, or with label alternatives that meet the requirements for the standard. However, the information supplied on these labels must be consistent with the revised HCS, e.g., no conflicting hazard warnings or pictograms.

E. Employee Training and Education – Turner Construction Company is responsible for training all Turner employees with regards to the HCP and the new GHS label elements (i.e., pictograms, hazard statements, precautionary statements, and signal words) and SDS format by December 1, 2013. An on-line training module on Turner University will be required to be taken by all employees by December 1, 2013. Full compliance with the final GHS rule will begin in 2015. The list below contains the minimum required topics for the training that must be completed by December 1, 2013.

1. Label elements
    a. Type of information the employee would expect to see on the new labels, including the product identifier, signal word, pictogram, hazard statement, and precautionary statement.

    b. Name, address and phone number of the chemical manufacturer, distributor, or importer.

    c. How an employee might use the labels in the workplace.

    d. General understanding of how the elements work together on a label.

2. SDS
    a. Standardized 16-section format, including the type of information found in the various sections.

    b. How the information on the label is related to the SDS.

    c. How to read and understand the information provided on the SDS.

3. An overview of the OSHA Hazard Communication Standard (29 CFR 1926.59).

4. The inclusion of welding or burning gases, cement, solvents, glues, wood dust, and soldering fumes as examples of common items to most jobsite, which present hazardous exposures to employees.

5. All employees attending a training class will sign an attendance form to verify that they have been properly trained in the Hazard Communication Program.

F. Hazardous non-routine tasks - Periodically, employees are required to perform hazardous non-routine tasks. An example of hazardous non-routine tasks is confined space entry to check the bottom of caisson. Prior to starting work on such projects, each affected employee will be given information by their supervisor about hazardous chemicals to which they may be exposed during such activity.

    This information will include, but not be limited to:

    i. Specific chemical hazards.
    ii. Measures that employees will take to prevent exposures.
    iii. Measures the company has taken to lessen the hazard, including ventilation, respirators, presence of another employee, and emergency procedures.

6. Demolition / Renovation - When doing renovations or demolition at a jobsite, it is important to know the contents of all unmarked pipes, vessels, tanks or other type of containers as well as the location of lead, asbestos or other potentially hazardous materials that may be encountered. This information should be obtained from the Phase 1 Environmental Assessment and/or similar reports

provided by the building owner. Once such information is identified, all of the above Hazard Communication program requirements must be enforced in order to communicate appropriate information to employees.

III. Employee Training Requirements

In compliance with the OSHA Hazard Communication Standard (HCS), Turner Construction Company has developed a Hazard Communication Program. This program is intended to inform employees of the potential hazards of chemical products that they may be exposed to while on the jobsite. By providing this information, our goal is to ensure that proper precautions are taken to minimize the health risks associate with the use of materials used in the construction of any building by Turner.

In accordance with Turner policy, a written Hazard Communication Program (HCP) is prepared and maintained on the job by the Turner Project Staff. Included are specific guidelines concerning requirements of the Federal Law, such as safety data sheets, labeling and personal protection. The following areas must be covered during each training session:

A. Safety Data Sheets - These are information sheets developed by the manufacturer of products (i.e. glues, solvents, paints, insulation), which contain hazardous materials are required to have the standardized 16 sections. SDS's are obtained by Turner for all material brought on the site by Turner or any subcontractor.

B. Labeling - Labels are an appropriate group of written, printed or graphic information elements concerning a hazardous chemical (i.e. paint, caulk, thinner, glue, or other material) that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging. Labels from the containers should never be removed. Labels must include the product identifier, signal word, pictogram, hazard statement, and precautionary statement.

C. Personal Protective Equipment - If personal protection is required, it will be provided for you by Turner or by subcontractors. In most cases, you will need nothing more complicated than safety glasses or goggles, gloves or a respirator. Equipment you will need will be determined by the information on the SDS provided by the product's manufacturer.

HCS Pictograms and Hazards

Health Hazard	Flame	Exclamation Mark
		
▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity	▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides	▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder	**Corrosion**	**Exploding Bomb**
		
▪ Gases Under Pressure	▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals	▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
Flame Over Circle	**Environment** **(Non-Mandatory)**	**Skull and Crossbones**
		
▪ Oxidizers	▪ Aquatic Toxicity	▪ Acute Toxicity (fatal or toxic)

IV. Roles and Responsibilities

A. Turner Management:

a) Must conduct inspections of the workplace for compliance with this policy and with mandatory GHS training by December 1, 2013.
b) Must discuss policy applications during project orientation with subcontractors.

B. Subcontractor Management:

a) Must comply with and furnish materials necessary to comply with Turner policy.
b) Must conduct mandatory GHS Training for their employees by December 1, 2013 and participate in project orientations.

C. Subcontractor Employees:

a) Must attend and participate in HCP Training and project orientations.
b) Must comply with this policy.

Housekeeping Policy

I. Policy Statement

This policy will apply to all work performed by Turner Project employees, contractors and tool vendors including, but not limited to, the following activities: construction, installation, demolition, remodeling, relocation, refurbishment, testing, and servicing or maintenance of equipment or machines. In addition, each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart C – General Safety and Health Provisions.

II. Procedures

1. Work areas must be kept clear and free of obstructions by material/debris as follows:

   a) Clean-as-you-go practices are required. Do not wait until all work has been completed before cleaning up. Instead, break the work down into smaller tasks and clean the area after each task is completed.

   b) Materials will not be stored in a manner that will block, restrict, impede or prevent access to an egress path or emergency equipment, such as fire extinguishers, emergency eyewash or shower, emergency shutoff buttons or emergency disconnect devices.

   c) Stairways shall not be used as storage areas.

   d) Work that may temporarily block emergency exits, safety showers, elevators, corridors, and hallways will require prior Turner approval.

   e) Project will enforce Turner's "Nothing Hits the Floor" requirements. All trash, debris, and scrap materials are to be placed into contractor-provided rolling trash hoppers, forklift-mounted hoppers, or other trash collection receptacles (that do not require workers to lift and carry) immediately upon creation. Upon filling any such receptacle, Contractors must remove all of its trash/debris and recyclables from the building to the agreed upon roll-off or dumpster. Provide an ample number of trash receptacles to allow each crew/team that generates waste or recyclables to have one. No "piling" will be allowed on the floors. Construction materials, job-boxes and tools must be stored/staged in approved areas, and never in walkways or stairways. Cords, hoses and welding leads must be kept off the floor at least 8 feet high in walkways, aisles, and stairs and access points.

   f) Housekeeping methods will be specified within your Job Hazard Analysis (JHA) and Pre-Task Plan (PTP).

2. Power Cord and other Utility or Hose Management:

   a) All cords must be inspected before use.

   b) At no time shall cords be strung across exits or in front of emergency equipment.

   c) Run cords overhead in a supported fashion, when feasible.

d) Run cords around perimeters, when feasible.

e) Tape cords down or use cord covers, if they present a tripping hazard.

f) Support all cords that run through floors or ceilings with appropriate means.

g) All cords must be stored and put away after use. (I.e. not coiled up on floor).

h) All extension cords must be equipped with GFCI protection or be plugged into wall GFCI outlet.

i) Provide non-conductive hanger mechanisms or cord/hose pole-stands. Must be anchored to prevent accidental displacement.

j) If the above listed safety requirements cannot be met, temporary wiring must be installed to facilitate proper cord management.

3. Material Storage:
   a) Lay-down and storage areas are extremely limited on site. Contractors are not to bring more materials onto site than they will install during a week. All Materials stored in the building must be staged on wheels to allow for quick and easy relocation.

   b) Materials stored in the vicinity of the area where work is performed should be limited to only those materials that will be used in the same shift.

   c) Materials not to be stored in egress paths, stairways or within 10 feet of any opening edge, shaft or side which material could fall to next level.

   d) Any material stored in a work area longer than 24 hours must be approved by Turner.

   e) Materials should be stacked in a safe and orderly manner. Materials to be secure to prevent accidental displacement.

   f) Material must be stored to promote mobility of material. Pipes, conduits, metal fabrications and steel framing are to be stored on rolling racks or similar conveyance. Bulk material should be palletized to allow for easy mobility using a pallet jack. Store all items neatly on carts, in cabinets or on shelves. Storage containers to have casters or other mechanism for easy movement of containers.

   g) Materials stored should be designed and stage to incorporate ergonomic and mechanical advantage. Material movement and storage methods will be specified within your Job Hazard Analysis (JHA) and Pre-Task Plan (PTP).

   h) Gang boxes and toolboxes should not have materials stored on top of them.

   i) If more storage area is needed, contact Turner.

4. Chemical Storage:
   a) All chemicals and quantities brought on site must be pre-approved by Turner.

b) The user of the chemical must provide Turner Construction a Safety Data Sheet prior to bringing the substance on site.

c) All chemicals and equipment containing chemicals must be stored in approved areas. (i.e. chemical cabinet, bunker)

d) Contractors are responsible for removing all unused chemicals from the Turner Project site at the completion of their contract.

e) All chemical containers must be properly labeled.

f) Chemical/gas cylinders (welding, purging, leak detection cylinders, etc.) must be secured at all times.

g) All dedicated chemical storage areas must have safety data sheet (SDS) available at the storage location.

h) If you are unsure of appropriate storage areas, contact Turner for direction.

5. Material/Waste Disposal:
   a) Waste disposal methods will be specified within your Job Hazard Analysis (JHA) and Pre-Task Plan (PTP).

   b) All hazardous waste must be disposed of in accordance with Federal, State, and Local regulations and shall comply with applicable Turner hazardous waste programs.

   c) All hazardous waste must be properly labeled.

   d) Hazardous waste materials must be discarded into proper disposal containers

   e) Non-hazardous waste must be disposed of into appropriate recycle or disposal containers.

   f) Waste separation, recycling and reduction methods are encouraged on all projects and are to be made a part of the project logistics plan.

Incident Investigation and Reporting

I. Incident Reporting

For an incident involving personal injury, the subcontractor shall complete and submit to the Turner Project Safety Manager the Turner Incident Report and Employer's First Report of Injury/Illness

The Project Safety Manager and/or Superintendent shall notify the Business Unit Claims Coordinator and BU Safety Director (BUSD) as soon as practical after the incident, but no later than 8 hours. A second Incident Investigation Report will also be completed by the Turner Project Superintendent and submitted within 24 hours to the Project Manager and BU Safety Director for their review.

II. Responsibilities

All incidents resulting in injury or property damage are to be reported at the time of occurrence to the Turner Project Superintendent. The contractor in charge of the person(s) involved or witnesses to the event will complete a TCCO incident investigation form and request each craft person involved to complete a written statement whenever such events take place. Turner and or the Owner may require a more detailed investigation and the Contractor shall comply with their directions.

III. Incident Reporting Procedures

1. Near Miss/ Injury Free Event

It is the responsibility of the prime contractor safety representative or Turner Project Superintendent to complete the investigation using the Turner Construction Company Incident investigation report. This report will include recommendations / implementation of corrective actions. The report will be submitted to the Turner Project Manager as soon as reasonably possible (same work shift) but no later than 24 hours. A gathering of all involved will take place within 24 hours of the incident to review the case and determine if the steps taken to remediate the incident were appropriate. If applicable a Lesson Learned will also be developed and approved by TCCO to relay any information gathered that may assist in the elimination of a future similar occurrence.

2. First Aid Event

Any first aid event will result in a full incident investigation. TCCO feels that no injury is minor but an opportunity to learn and eliminate like occurrences. Daily records of all first-aid treatments not otherwise reportable shall be maintained on the site first aid log.

3. Medical Treatment Event

If the injury is considered an emergency call 911. It is the responsibility of the each contractor to immediately notify Turner Project Superintendent, and the Turner Project Safety Manager of any event requiring medical treatment. Failure to do so may result in subcontractor. The Turner Safety Manager or Turner Project Superintendent will call in the

claim to the assigned worker's compensation carrier.

4. Serious Injury Event

It is the responsibility of the each contractor's safety representative to immediately notify the Turner Project Superintendent of a serious injury requiring medical treatment. The Turner Safety Manager or senior TCCO project representative will oversee the completion of required Turner reporting forms. The Turner Business Unit Safety Director and Claims Manager shall be notified as soon as possible. The Turner Business Unit Safety Director will contact OSHA when required, regardless of the of the contractor's requirement to notify. The BUSD will call the Turner Crisis Hotline when appropriate.

5. Fatality

It is the responsibility of the contractor safety representative to notify the Turner Project Superintendent or the Turner Safety Manager of an event resulting in a fatality. The Turner Project Superintendent will then implement the Turner Crisis Management Plan. All notifications must follow in accordance with the Turner Crisis Management Plan notifications flowchart. The BUSD, BU Claims Manager, General Manager, and Operations Manager must be notified immediately. All media inquiries are to be referred to the Owner or as the Site Specific Crisis Plan dictates.

6. Property/Environmental Damage

It is the responsibility of the Turner Project Superintendent to notify the Turner Project Manager and Owner of the incident and assist in the assessment of damages. The Turner Project Manager will be responsible for notifying applicable insurance carriers in accordance with policy provisions. The Business Unit Safety Director and Claims Manager shall be notified in all cases.

7. General Liability Accident

It is the responsibility of the subcontractor safety representative to immediately notify the Turner Project Superintendent of an event involving the general public. The Turner Project Manager will immediately notify the Owner. The subcontractor involved will complete an incident report and submit it to the Turner Superintendent or his designee. The Business Unit Safety Director and Claims Manager shall be notified. The BUSD and Claims Manager will determine if a Third Party Investigator will be needed.
In all cases of damage, an incident, or injury, a full investigation will be conducted by TCCO and the contractors to determine potential contributors to the incident in hopes of eliminating the conditions reoccurrence on this or any project. The intent of the investigation is not to affix blame but to learn from the event.

IV. Documentation for all Incidents Requiring Medical Treatment (Emergency and Non-Emergency)

The following forms must be completed and delivered to the Project Safety Manager. These will be made available at the site.

- Turner Construction Company Report form
- Employee Incident Statement(s)
- Subcontractors Incident Report

All incidents, near misses, injuries, illnesses and unusual events that have occurred will be investigated thoroughly:

Projects are responsible to have onsite equipment to document the accident scene. Photos, sketches, schematics should be collected for report.

Except for rescue and emergency measures, the accident scene shall not be disturbed and should be barricaded until it has been released by the investigating official. The Contractor is responsible for obtaining appropriate medical and emergency assistance and to ensure timely response to injured worker or event.

Incident reports are to be submitted to the Business Unit Safety Director and Claim Coordinator, within 24 hours even though supplementary information may be necessary but not available for a period of time.

"Subcontractor" is intended to mean any contractor working under Turner's inspection, supervision and/or direction whether under contract to Turner or the Owner as on Construction Management. This policy will be used on all projects at all times.

In all cases, the Site Specific Crisis Management Plan and the Site Specific Health and Safety Plan will be the guiding document.

Turner Construction Company - Incident Investigation Report

(To be completed within 24 hours by Supervisor)

GENERAL INFORMATION

Date: _____ **Contract Number:** _____

BU Name: _____ **Project Name:** _____

Project Address: _____

Program: ___CCIP ___CORP ___OCIP ___Other **Explain (if other):** _____

Site Contact Name: _____ **Phone:** _____ **Cell:** _____

Exec: _____ **Superintendent:** _____

Date of Incident: _____ **Time:** _____ ___AM ___PM **Shift:** _____

Jobsite/Area (refer to columns/beams/drawings as needed): _____

Weather Condition: _____ **Lighting Condition:** _____

INVOLVED PARTY INFORMATION

Name: _____

___Male ___Female **Date of Birth:** _____ **Height:** _____ **Weight:** _____

Address: _____

Home Phone: _____ **Employee ID# :** _____

Employee Job Title: _____ **Length Employed:** _____

Employer Name: _____ **Supervisor:** _____

Cell #: _____ **Employer Address:** _____

Shop Steward: _____ **Cell #:** _____

Speaks Fluent English: ___Yes ___No **Language:** _____

INCIDENT DESCRIPTION

Describe in detail how the incident occurred and the task being performed by the involved party when he/she claims to have been injured or became ill including how long and with whom they were performing the task. Include specifics such as equipment, structure, tools, materials, objects (size, shape and weight), positions, distances, sequence of events, etc. [Facts Only]

Enter Description Here

Attach a diagram of the incident scene/site layout to better describe the incident

Date: _____ **Prepared By:** _____

Turner Construction Company - Incident Investigation Report

WITNESS INFORMATION

Name: _____ **Phone:** _____ **Cell:** _____

Company: _____

Name: _____ **Phone:** _____ **Cell:** _____

Company: _____

Name: _____ **Phone:** _____ **Cell:** _____

Company: _____

Name: _____ **Phone:** _____ **Cell:** _____

Company: _____

INCIDENT INFORMATION

Describe the nature and extent of <u>all</u> claimed injury(s) / illness (body part affected, type of injury, etc.)

Enter Description of Claimed Injury Here

Was First Aid Administered? ___**Yes** ___**No** **By Whom?** _____

Was Employee/Third Party taken to Hospital / Clinic? ___**Yes** ___**No**

If yes, list name, phone and address: Name: _____ **Phone:** _____

Address: _____

Is employee in a Trade Union? ___**Yes** ___**No** **If yes, provide Trade & Local #:** _____

Additional Comments:

Enter Any Additional Comments Here

All incidents need to be immediately reported to your BU Safety Director & Claim Coordinator.

Copy to be submitted to BUSD and Claim Coordinator for filing. Original to be kept with job files.

Date: _____ **Prepared By:** _____

Turner - Witness Statement Form

Name: _____

Address: _____

Telephone #: _____

Date of Incident: _____ Time: _____

Location of Incident: _____

STATEMENT

I observed the following at the time of the incident:

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____ _____

Date Witness Signature

Personal Protective Equipment

I. Policy Statement

All employees of Turner will be provided the personal protective equipment necessary to complete their jobs safely. Mandatory personal protective equipment required on the project site includes, but is not limited to, hardhat, safety glasses, gloves, reflective vests, and sturdy leather work boots at a minimum. A competent person onsite will determine necessary equipment. Each subcontractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart E – Personal Protective and Lifesaving Equipment in addition to the following guidelines.

II. Procedures

1. All Turner employees, subcontractor employees and visitors to project sites are required to wear safety glasses that comply with ANSI Z87.1. Dark lenses are not to be worn inside of buildings, in enclosed areas or at night. Prescription eyeglasses and sunglasses that do not comply with ANSI Z87.1 are **prohibited**.

2. All Turner employees, subcontractor employees and visitors to project sites are required to wear hardhats that comply with ANSI Z89.1. Cowboy hardhats, aluminum hardhats, and bump caps are not permitted on Turner Construction Company Projects. All hardhats shall display the contractor name and/or decal indicating whom the employee works for as well as the employee's name. Employees exposed to electrical voltages of 600 V or greater shall wear hardhats that meet the requirements of ANSI Z89.2 Type Hardhats.

3. All Turner employees, subcontractor employees and visitors to project sites are required to wear work boots with sturdy leather uppers. Employees working with jackhammers, tampers and similar equipment are required to utilize metatarsal guards over their work boots.

4. Where employees are performing work that could potentially cause materials to become flying objects such as, but not limited to, chipping, welding, grinding, cutting, drilling and chiseling, they shall utilize a face shield in addition to safety glasses. A face shield shall be worn while using powder-actuated tools and drilling overhead. Additionally safety goggles may be required.

5. Where necessary, each employee shall use equipment with filter lenses that have a shade number appropriate for the work being performed for protection from injurious light radiation.

6. Where employees are performing work that could potentially expose them to harmful chemicals or micro airborne particles they may be required to utilize safety goggles and or a face shield. Please refer to manufacturer SDS for specific requirements. Goggles are required for abrasive actions in which dust can enter the eye.

7. Hand protection is required at all times unless the Job Hazard Analysis specifically states they are not required. The competent person for each contractor is expected to select the appropriate cut resistant level glove that mitigates the potential hazard presented to their employees.

8. Appropriate arm protection is required during operations where the arms are exposed to cut hazards (i.e. Kevlar sleeves, etc.). These operations shall be identified on the JHA/PTP.

9. Contractors exposed to dust, fumes, and/or gases shall be provided with proper respiratory protection designed to protect against the particular substance encountered. The Contractor is solely responsible for the proper testing and training per OSHA standards, and to provide the appropriate equipment.

10. Workers exposed to roofing tar must wear long sleeved shirts and gloves. Workers who are directly exposed to hot tar must also wear a full apron and face shield.

11. Where an employee could be exposed to noise in excess of 85 dBA, their employer will provide hearing protection, which will reduce the noise to an acceptable level. If the noise levels are determined to cause and 8 hour TWA exposure greater than 85 dBA, the subcontractor shall be required to submit a detailed hearing conservation program to Turner. This program shall be approved prior to beginning work.

III. Roles and Responsibilities

1. Turner management-
   - Conduct hazard assessments to identify specific PPE for Turner Craft Workers and ensure adequate hazard assessments are conducted by the subcontractors.
   - Supply necessary PPE and training to Turner staff.
   - Monitor use of PPE by Turner staff and subcontractors.

2. Subcontractor management
   - Conduct hazard assessments to identify specific PPE for Contractor Workers and ensure adequate hazard assessments are conducted by their subcontractors
   - Provide necessary PPE and training.
   - Monitor use of PPE.
   - Provide replacement PPE when needed.
   - Identify any new hazards that would require the use of PPE.
   - Be responsible for the assurances of PPE adequacy, maintenance and sanitation.

3. Subcontractor employees
   - Properly use and care for assigned PPE.
   - Immediately inform supervisor if PPE is damaged or not effective.

Job Hazard Analysis / Pre-Task Planning

I. Policy Statement

This policy identifies the method of Job Hazard Analysis and Pre-Task Planning that are required for each work operation not only by Turner but also for each subcontractor, regardless of tier. The Job Hazard Analysis (JHA) and Pre-Task Plan (PTP) will be submitted to the project team for review and comment prior to starting the work in the field. Sample forms are available in the forms section of the manual, the Subcontractor Safety Requirements section and in the Safety Section of the TKN2 Document Management System.

II. Procedures

1. Job Hazard Analysis – JHA
   a) For each phase or major type of work a JHA will be completed to identify the following:
      - Safety and Health Considerations
      - Description of Steps to be Performed
      - Hazards Associated with Each Step
      - Required Action to Eliminate or Control the Hazard
      - Supervision Sign-off

   b) Work shall not begin until the JHA for the work activity has been accepted by Turner Construction and discussed with all engaged in the activity, including the Contractor, subcontractor(s), and other affected on-site representatives at safety pre construction meetings.

2. Pre-Task Planning – PTP

   This daily plan is designed to take place at the start of each work shift. Subcontractor supervisors should meet with their crews to discuss the tasks to be accomplished and the steps that need to take place to work safely. All workers should review and sign the relevant PTP for their assigned work. The main components of the Pre-Task Plan will include the following:

   - Evaluating the Work Area
   - Potential Hazard Checklist
   - Description of Steps to be Performed
   - Hazards Associated with Each Step
   - Required Actions to Eliminate or Control the Hazard
   - Crew Sign-off

   A copy of the PTP shall be kept near the work location and the original will be submitted to Turner on a daily basis.

   The information the supervisors are relaying to the workers is the same that was developed in the JHA however, the PTP will greater define the plan for that particular phase of work.

III. Roles and Responsibilities

1) The Subcontractor representative is responsible for submitting JHA's to the Turner Project Superintendent 7 days prior to the start of work. The JHA shall be utilized during the safety preplanning meetings with subcontractors.

2) The Subcontractor representative is responsible for completion of PTPs, communications with trade workers, and archiving of the documents. The frontline workers shall be engaged during the creation of the PTP's.

3) The Project Superintendent will ensure that all JHA's and PTP's are completed for all phases of construction activities for Turner, subcontractors and all tiers.

4) Pre-construction meetings should always be held by the project team and attended by direct supervisory personnel of the subcontractors who will perform the work.

Project Safe and Sustainable Onsite Orientation

I. Policy Statement

A critical component of a successful Safety, Health, and Sustainable program begins on the first day an employee begins with a company. It is the policy of Turner Construction that all employees will receive this Orientation prior to beginning work. Everyone working on a project shall receive project specific safety and sustainability orientation prior to entering the project site.

While each Business Unit and/or Project may develop an orientation program that meets their specific needs, the following must be presented to all Turner Employees and Employees of Turner Subcontractors prior to beginning work:

- Turner Corporation Safety and Mold/Moisture Video/DVDs (Available in English and Spanish at the Turner Store and on TKN2)
- Review & completion of Turner Safe and Sustainable Orientation Checklist.
- Hazard Communication / GHS information specific to Office or Project.
- Crisis Management Plan specific to Office or Project.
- Safety Programs Specific to Office/Project (JHA's PTP's, PPE)
- Applicable Organized Labor Agreements.
- Specific information about the project.
- SWPPP/EH & S Plan

II. Hazard Communication Program (GHS)

1. Written HAZCOM programs, Chemical Inventory Lists and SDS's (formally MSDS's) should be kept in the Turner site office for all hazardous chemicals.

2. All containers must be identified and labeled.

3. Each employee must be trained in the recognition and avoidance of hazards when asked to work with any chemical.

III. Emergency Procedures

1. Notify your supervisor immediately of any injury, illness or incident. They will notify Turner.

2. Injuries must be treated by a health care professional. Call 911 or other designated emergency numbers for assistance. Report all injuries regardless of severity.

3. Emergency contact numbers and maps to the nearest hospital are to be posted at entrances to trailers.

4. A job-wide First-Aid kit must be on-site and easily accessible. Each subcontractor is also responsible for providing a first-aid kit.

IV. Construction Waste Management

1. All waste leaving the project is tracked on Turner's Online Waste Tracking (OWT) system. Strict compliance with the project Construction Waste Management Plan (CWMP) is required. The recycling goal is _____%. The construction and demolition dumpsters on this project are (co-mingled) (site-sorted). Materials recycled include, at a minimum:

    A. Wood: pallets, wood-framed boxes, temporary lumber, etc.
    B. Concrete: concrete, block, brick, asphalt,
    C. Metal: scrap metal, metal studs, metal pipe, etc.
    D. Cardboard, paper
    E. Drywall: drywall, mold board, (NO Dens Glass)
    F. Construction Trash: food waste, sweepings, non-recyclable waste, etc.

2. Collect and sort your construction waste throughout the workday and transport the waste to the appropriate dumpster at the time established by your Foreman or Project Manager.

3. All Subcontractors are required to recycle to the maximum extent possible as a part of their Contracts using Turner's OWT tool. In cases of non-compliance, only the Subcontractor(s) responsible for contaminating dumpsters (placing waste in the wrong dumpster) will be responsible for fines, additional tipping fees, or other penalties as may apply.

V Indoor Air Quality

1. Strict compliance with the project Indoor Air Quality (IAQ) Management Plan is required.

2. Safety Data Sheets (SDS), along with VOC content, of all adhesives, sealants, coatings, paints, carpets, composite woods, etc. must be submitted for review and approval prior to these products being brought on site.

3. Stored material shall be covered, stored off of the deck, and kept in a dry environment. Quantities should be limited to what can be installed in a reasonable time (e.g. two weeks or less).

4. This project is **Tobacco-Free.** Zero tolerance for smoking in the building during construction.

5. Changes in finished areas should be treated as renovations.

6. For large changes, install temporary dust protection to separate the work area from the finished space. The work area should be kept negative and a HEPA filter should be used to filter the air prior to it leaving the space. The temporary protection and filter system should be approved by a Turner superintendent before beginning work. Once the work is complete, the area should be thoroughly cleaned and the temporary protection should be removed.

7. For small changes, a vacuum with a HEPA filter should be used to collect any dust that is generated and the areas should be thoroughly cleaned after the work is complete.

8. Daily clean-up of all work areas is required by each subcontract.

9. All subcontractors will be required to use sweeping compound.

10. All cleaning products used on the project must comply with Green Seal Standard GS - 37 for Industrial and Institutional Cleaners.

11. Mold and moisture control is a key to proper indoor air quality. If possible, drywall activities should not begin until the building is watertight. If drywall must start before the building is watertight, moisture resistance board should be used.

12. Controlling dust generation will be top priority in the sequence of activities after the mechanical system is turned on.

VI Site Management

1. Strict compliance with the project Construction Activity Pollution Prevention Plan (CAPPP) and Erosion and Sedimentation Control (ESC) Plan is required.

2. Use and maintain earth dikes, silt fence, sediment traps, and/or catch basin filters to trap and separate silt.

3. Cover all stockpiles with plastic sheeting on a daily basis.

4. Do not leave spoils piled on site for extended periods. If possible excavate, install utilities, backfill and grade each day. Sequence the work to minimize exposure.

5. Maintain existing hardscapes/landscapes (asphalt, concrete, grass, plantings) as long as possible.

6. Provide and use wheel washing facilities or maintain rip rap entries and exits.

7. Use Eco pans for concrete truck clean-up if available. If not, make sure slurry is contained and does not infiltrate catch basins or waterways.

8. Secure all materials and stockpiles and check site prior to storm events.

9. Use only designated areas for equipment maintenance and wash down.

10. Minimize the generation of dust and the tracking of sediment to off-site paved areas.

11. Minimize site disturbance during construction activity.

12. Comply with all applicable noise mitigation activity.

13. Comply with all applicable vehicle emissions requirements.

Hardhat #: _____ Badge #:_____

PROJECT SAFE AND SUSTAINABLE ORIENTATION

The signatures below document that the appropriate elements have been discussed to the satisfaction of parties, and that both supervisor and employee accept responsibility for maintaining a safe and healthful work environment.

Print Name: _____

Sign Name: _____

Company Name / Date _____ /

Supervisor Acknowledgement _____

Emergency Contact Name and Number _____

General Initials	1. **No one under the age of 18 is allowed to work on the Project property / construction site.** 2. Drug testing is mandatory A. Your employer must provide the results to Turner in order to receive badge or attend orientation. B. Pre-employment/prior to badging C. Post Incident D. Test for cause – suspicion E. If tested positive or refuse to test, will not be allowed on site 3. Badging / orientation sticker All employees on site for more than one (1) day must obtain a badge / attend orientation / drug screen 4. All OSHA regulations will be strictly enforced. A. Disciplinary Procedures – 3 strikes, you're out *1.* Verbal = ***Orientation*** *2.* Written *3.* Termination *4.* Turner retains the right to have you removed from site, based on the nature of the violation, without the 3 strikes (i.e., ZERO TOLERANCE). 5. Fall Protection – **ZERO TOLERANCE** Policy in effect 6. Every crew member must complete and participate in a Pre-Task Plan (PTP) meeting each day before starting work. 7. No headphones, IPods, radios, etc. are permitted on the job.
Incident Reporting Initials	1. Any injuries / illnesses / near misses on site must report to their supervisor immediately after the event, if physically possible. 2. You and your employer shall cooperate with the incident investigation. 3. A "First Report of Injury" form must be filed with Turner Safety Office within eight (8) hours after an accident. 4. If sent to a doctor for treatment all follow-up appointments must be kept. 5. A Temporary Modified Duty policy is in place. 6. The worker must strictly follow any and all work restrictions issued by doctor.

100% 6-Foot Fall Protection **(Regardless of Trade)** Initials	1. **100%** FALL PROTECTION 6-foot and above (Includes all Trades) **2. ZERO TOLERANCE –** For Fall Violations 3. Full body harnesses and double lanyards with double locking snap hook 4. Gear to be inspected prior to every use. **Contact your supervisor immediately if gear is damaged. DO NOT USE DAMAGED GEAR**. 5. No knots or rigging can be used for fall protection. 6. Warning lines are to be a min. of 15 feet back from the edge. (see criteria in Turner Safety Manual) 7. Tie off point must hold 5,000 LBS or 2x SF as engineered anchorage point. 8. 100% tie off when working from extensible / articulating boom aerial lift. 9. Employees must be trained on the use of fall protection. 10. Vertical or horizontal rebar or other impalement hazards shall be protected. 11. Any hole 2" or larger must be covered, secured, labeled (supporting 2X max the indented load) 12. Scaffolds A. Must be built under supervision of competent person who has necessary certifications (w/ **100% Fall Protection while erecting**) B. Proper ladder access is required. Cross bracing cannot be used as a ladder or for a guardrail. C. Scaffold must be inspected before each shift by the Subcontractors competent person and tagged/dated as safe. If you climb onto a scaffold not tagged and dated as safe, you may be removed from the jobsite. D. 100% tie off when working from all types of lifts that have a manufactured tie off point. Dual

	action controls require that there be two separate actions to activate the lift. If it arrives on site and does not have dual action controls, then it must remain inoperable until a Dual action control is installed. E. <u>All mobile scaffolds must have rails at all heights & the wheels locked when in use.</u> 13. Standard Railing A. Top edge height of top rail must be 42" <u>+</u> 3" above the walking/working level and all systems must include a toe board and midrail. B. **Guardrails will not be used as a horizontal anchorage for personal fall arrest equipment**. *1.* <u>Do not tie off to guardrails</u> C. <u>Guardrails must be provided at floor openings and open sides, or personal fall protection must be used.</u> D. Wood rail supports shall not be more than 8 foot on center. E. Wire rope guardrails – min 3/8 inch cable, flagged every 6 feet, cannot have more than 3 inches of deflection, 3 clips are required at each termination, no open turnbuckles 14. Ladders A. No aluminum or wood ladders are permitted on the site, only platform ladders are permitted B. Ladders cannot be used onsite unless a ladder permit has been filled out & approved by the Turner Superintendent. Use lifts or scaffolds as the first option. C. Please inspect all ladders before each use D. Never use a folding ladder as a straight ladder E. Never use the top two (2) steps or the top of the ladder F. Never store material or tools on the steps of a ladder G. Employees shall be trained on ladder use/safety H. Use the 3-point rule: 2 hands and a foot or vice versa to be in contact with ladder at all times. Keep belt buckle between side rails. If three point contact is not possible 100% fall protection using a retractable devices is required. ***<u>Turner will approve perimeter access points for material handling. Personal fall protection must be put in place before cables or rails are taken down, or holes uncovered. Barricade the area, place sign, and leave a spotter.</u>***
Safety Enforcement Initials	1. All personnel are encouraged to ask questions and report actual and **<u>perceived</u>** hazardous conditions to site supervision. Perceived hazardous conditions may need further clarification and hazard assessment. . If you have any questions or concerns, please ask for assistance. 2. There is a "Safety Enforcement" Fine System in place on this project. A. You are **<u>ACCOUNTABLE</u>** for your actions on this project. B. Monetary fines imposed upon your **EMPLOYER** for your inability to work in safe manner or complacency w/ regard to "**MINIMUM**" safety rules C. **$250.00 - $5,000.00** – depending upon severity of violation. D. You will be **<u>physically removed</u>** from job for serious and/or repeat violations. **3.** **<u>ALL</u> personnel** are empowered and encouraged to stop unsafe acts, identify unsafe conditions, & stop non-construction personnel and escort them out of the work areas. Please care for your project teammates.

Emergency Procedures Initials	1. In the event of an emergency A. Notify job foreman **immediately** B. Give the exact nature of the emergency (i.e. broken leg, fire, etc.) C. Give the exact location by area column or other easily recognizable terms D. Stay on the phone until Safety has confirmed that you have provided accurate information E. If an evacuation is not required, stay on the scene to brief emergency personnel upon their arrival. 2. Evacuation Procedures A. 3 horn blasts will indicate site is to be evacuated B. Proceed in a calm, orderly manner to the designated safety zone. *1.* **<u>PRIMARY MUSTER POINTS ARE TBD</u>** *2.* Report to your designated foreman/superintendent in designated area for head count. **C. DO NOT LEAVE SAFETY ZONE OR GO HOME UNTIL INSTRUCTED BY YOUR SUPERINTENDENT** **D. ALL DANGEROUS AND/OR EMERGENCY SITUATIONS MUST BE REPORTED TO TURNER ON SITE STAFF within 15 minutes of the event if feasible.** **E. Turner to call 911 for ambulance as necessary.** **F. Where is the location of your first aid kit and fire extinguishers? Keep this in mind while working.**

Personal Protective Equipment Initials	1. Basics: A. 100% Hardhat Protection, Non Metallic, **REQUIRED AT ALL TIMES. ANSI approved** B. 100% Eye Protection (ANSI Z87.1) **REQUIRED AT ALL TIMES**. C. Hard sole work boots are required, **no sneakers or soft shoes are allowed, ANSI Z41.1. Steel toed boots/metatarsals must be worn as dictated by the hazard assessment.** D. Long pants in good condition, no shorts allowed E. Shirts must have sleeves at least 4" long F. Cut resistant gloves are required when using knives or handling sharp material/objects. Additional hand protection may be required depending on the hazard assessment. G. Ear protection as required when exposed to noise above 85 DBA H. Face-shields or goggles required when cutting / grinding / chipping / etc. I. No loose clothing or jewelry J. High visibility vest is required when working around machinery. K. Any contractors requiring the use of dust masks and/or respirators must submit a written respiratory protection program Turner. This program must address medical surveillance, fit testing, etc. Voluntary usage of dust mask type respirators used by employees must also be included in the respiratory protection program and shall meet or exceed OSHA standards.

Electrical/LOTO Initials	1. Industrial heavy weight cords (14 gauge or heavier) with proper grounds are to be used at all times. 2. 100% Ground Fault Circuit Interrupter (GFCI) Protection. 3. Inspect all cords and welding leads before each use A. Damaged items must be repaired or removed from the job site B. All cords and leads are to be elevated above all main walkways. 4. **ALL** Electrical and mechanical systems are to be considered **LIVE**. 5. All boxes containing live wires must have a cover. 6. **NEVER** work on live electrical panels without prior approval from Turner. 7. **LO/TO – Single lock keys (cannot have multiple keys)**
Equipment Initials	1. Proper training and certification is required prior to operating any equipment. 2. All stops must be observed at intersections. Complete stops must be observed. 3. Speed limit on site is 5 mph or a safe operating speed whichever is slower. 4. A spotter is mandatory when view is obstructed by load. 5. Backup alarms must be present on all required vehicles. 6. Horns and lights are recommended for all equipment. 7. Always follow the manufacturer's operating instructions for all equipment and tools used on this project. 8. Seatbelts must be worn at all times. 9. The use of cell phones is prohibited while the machine or vehicle is in motion. 10. The forks of a forklift cannot be used for free rigging.
Cranes Initials	1. Awareness of overhead loads – listen for horns. 2. **NEVER** stand or walk under an elevated load. 3. Awareness of crane swing radius (should be flagged off). 4. Cannot operate a crane within 20' of any power line. 5. Rigging must be inspected before each use by a qualified rigger. Damaged rigging must be removed from service. 6. Crane operator must submit operator certifications 7. Employees cannot signal a crane unless trained. 8. Each rigger & signal person must be qualified & proof of training given to Turner Construction
Barricade Tape Initials	1. Types of Tape A. **Red** – ***Imminent Danger*** exists. Only authorized personnel performing actual work are to be allowed in this barricade tape area. The only exception for entry into a red area is with prior permission of those authorized to work within the area B. **Yellow** – a hazard exists that would warrant ***Caution***. A yellow area can be accessed by anyone who is authorized to be on the job site, and who stops to observe the existing hazard and takes the proper precautions prior to entering the tape barricade area.

Training Requirements Initials	1. Must be trained / certified to operate forklifts, aerial lifts, scaffolding, cranes, etc. 2. Contractors are required to provide workers that are trained as required by OSHA standards and site policies. 3. All workers are to be trained by their employer for the task at hand – ladders, scaffolds, excavations, etc. 4. No worker may lift more than 50 pounds, unassisted. Use mechanical means first.

Housekeeping Initials	1. All trash/debris is to be placed immediately upon creation into rolling trash bins or hoppers that do not require workers to lift or carry. This includes lunch/break trash. Housekeeping is a CONDITION OF EMPLOYMENT. 2. Sweeping compound is a requirement of the Indoor Air Quality (IAQ) Management Plan. 3. Dust creating activities will take place only in accordance with the IAQ Management Plan. Any alterations in the finished areas will require either temporary dust protection or a vacuum with HEPA filter to collect dust generated. 4. Strict compliance with the Construction Waste Management Plan is required. Recycled materials include but are not limited to wood, scrap metal, concrete, cardboard, and drywall. Construction waste shall only be placed in the appropriately labeled dumpster. 5. Zero use of tobacco policy. No tolerance policy for smoking in building during construction. 6. Extension cords, hoses, welding leads, etc., must be run 8' overhead in all stairs, aisles, and exit areas. 7. When using stilts, the floor must be broom swept with not trip hazards. (Cords, material, and trash) 8. No glass containers are permitted onsite. 9. Storage of material must not be within 6 feet of any interior opening or 10 feet to the exterior without protection.
Hand & Power Tools Initials	1. All drills, grinders, etc. that are designed with guards and/or control bars must have them in place when the tool is in use. The grinding wheels must be rated per the specifications of the grinder. 2. Work stations are to be elevated. Chop saws & other work activities. 3. Powder Actuated Tools - No lead based shot is permitted onsite 4. Tools are to be used the way the manufacturer intended. Do not modify any tool.
Hot Work Initials	1. The contractor performing hot work will be required to have a charged and inspected 20 pound ABC dry chemical fire extinguisher present in the work area. 2. Appropriate permit procedures, shields, and blankets shall be used when developing site specific fire prevention programs. 3. Subcontractor is required to implement a fire watch during all burning operation for a minimum of 30 minutes following completion. 4. Hard Hats are required while welding. 5. Safety glasses are required under the shield when chipping or grinding 6. Cylinder Storage must be stored upright and properly secured. When not in use, disconnect hose/gauge assemblies and cap the cylinder. Stored cylinders must have a ½ hour fire rated barrier 5 feet tall or be stored 20 feet apart. Propane tanks cannot be stored in any building. (Turner must be notified prior to propane used onsite) All torch carts are to have a fire rated barrier between the cylinders. 7. Anti-flash devices are to be located at the torch head & at the cylinders 8. Hot Work activities must be pre-approved by Turner (Permit to be issued)
Excavations Initials	1. Any excavation greater than 4' must be sloped, shielded or benched properly 2. The bottom of the trench box must be within 2 feet of the bottom of the trench. The top of the trench box must sick up 18 inch above the slope or the bench. The box cannot be moved while workers are inside. 3. Access must be provided by a ramp or a ladder. Travel distance to ladder must not exceed 25 feet. 4. Any excavation must be barricaded off with orange fence or equivalent, regardless of depth. 5. You cannot bench Type C soil. 6. Before you dig, Miss Utility must be notified days in advance
Hazard Communication / GHS Initials	1. This employee, by his initials in this section acknowledges that he/she has been trained by their employer. 2. Turner will coordinate the sharing of Safety Data Sheets (SDS) between contractors. 3. The SDS's are available at the project.

Construction Waste Management Initials	1. All waste leaving this project is tracked on Turner's Online Waste Tracking (OWT) system. Strict compliance with the project Construction Waste Management Plan (CWMP) is required. The recycling goal is _____%. The construction and demolition dumpsters on this project are (co-mingled) (site-sorted). Materials recycled include, at a minimum: A. Wood: pallets, wood-framed boxes, temporary lumber, etc. B. Concrete: concrete, block, brick, asphalt C. Metal: scrap metal, metal studs, metal pipe, etc. D. Cardboard, paper E. Drywall: drywall, mold board, (NO Dens Glass) F. Construction Trash: food waste, sweepings, non-recyclable waste, etc. 2. Collect and sort your construction waste throughout the workday and transport the waste to the appropriate dumpster at the time established by your Foreman or Project Manager. 3. All Subcontractors are required to recycle to the maximum extent possible as a part of their Contracts using Turner's OWT tool. In cases of non-compliance, only the Subcontractor(s) responsible for contaminating dumpsters (placing waste in the wrong dumpster) will be responsible for fines, additional tipping fees, or other penalties as may apply.

Indoor Air Quality Initials	1. Strict compliance with the project Indoor Air Quality (IAQ) Management Plan is required. 2. Safety Data Sheets (SDS), along with VOC content, of all adhesives, sealants, coatings, paints, carpets, composite woods, etc. must be submitted for review and approval prior to these products being brought on site. 3. Stored material shall be covered, stored off of the deck, and kept in a dry environment. Quantities should be limited to what can be installed in a reasonable time (e.g. two weeks or less). 4. This project is **Tobacco-Free.** Zero tolerance for smoking in the building during construction. 5. Changes in finished areas should be treated as renovations. 6. For large changes, install temporary dust protection to separate the work area from the finished space. The work area should be kept negative and a HEPA filter should be used to filter the air prior to it leaving the space. The temporary protection and filter system should be approved by a Turner superintendent before beginning work. Once the work is complete, the area should be thoroughly cleaned and the temporary protection should be removed. 7. For small changes, a vacuum with a HEPA filter should be used to collect any dust that is generated and the areas should be thoroughly cleaned after the work is complete. 8. Daily clean-up of all work areas is required by each subcontract. 9. All subcontractors will be required to use sweeping compound. 10. All cleaning products used on the project must comply with Green Seal Standard GS - 37 for Industrial and Institutional Cleaners. 11. Mold and moisture control is a key to proper indoor air quality. If possible, drywall activities should not begin until the building is watertight. If drywall must start before the building is watertight, moisture resistance board should be used.

Site Management Initials	1. Strict compliance with the project Construction Activity Pollution Prevention Plan (CAPPP) and Erosion and Sedimentation Control (ESC) Plan. 2. Use and maintain earth dikes, silt fence, sediment traps, and/or catch basin filters to trap and separate silt. 3. Cover all stockpiles with plastic sheeting on a daily basis. 4. Do not leave spoils piled on site for extended periods. If possible excavate, install utilities, backfill and grade each day. Sequence the work to minimize exposure. 5. Maintain existing hardscapes/landscapes (asphalt, concrete, grass, plantings) as long as possible. 6. Provide and use wheel washing facilities or maintain rip rap entries and exits. 7. Use Eco pans for concrete truck clean-up if available. If not make sure slurry is contained and does not infiltrate catch basins or waterways. 8. Secure all materials and stockpiles and check site prior to storm events. 9. Use only designated areas for equipment maintenance and wash down. 10. Minimize the generation of dust and the tracking of sediment to off-site paved areas. 11. Minimize site disturbance during construction activity. 12. Comply with all applicable noise mitigation activity. 13. Comply with all applicable vehicle emissions requirements.

Stormwater Management Initials	1. Stormwater Pollution Prevention Plan (SWPPP) requirements were reviewed for subcontractor employees involved in ground disturbing activities. 2. The SWPPP requirements including Best Management Practices (BMP's) were reviewed and will be followed as required by the SWPPP. 3. The SWPPP drawings, project sequence and how sequencing will affect BMP locations were reviewed. 4. Notify Turner of any disturbances of the Best Management Practices (BMP's) including silt fences, vehicle mud removal areas, vegetative cover, other sediment and erosion controls. 5. Ensure all concrete/cement washout is performed at designated locations and into designated containers, notify Turner personnel immediately if washout is not adequately containing wash water and stop washout activity. 6. All site dewatering must be performed in a manner compliant with the SWPPP and all pump discharge locations must be previously approved by Turner. 7. Inspect all equipment and chemical storage containers for leaks as well as excess grease/grim/oil/fuel, if any of the above are discovered ensure that mechanics are notified (if necessary) and equipment/containers are wiped clean and containments disposed of properly. 8. Ensure parked equipment and chemical storage containers are parked/stored in locations previously approved by Turner and are identified on the SWPPP map. 9. Know where the SWPPP map is located and identify the spill kit location on it, notify Turner personnel immediately if a spill occurs.

Nothing Hits the Ground Initials	FABRICATION: 1. All material fabrication shall be performed at a work station between 30 and 39 inches off the floor. 2. Work station shall be mobile and include a fire stop directly behind all chop saws. 3. Rubbish containers shall be mobile and located directly adjacent to the work station. 4. Mobile rubbish containers must be made available for subcontractors work. HOUSEKEEPING: 1. All rubbish shall be disposed of as it is generated and be immediately place in a mobile rubbish container provided by the subcontractor. 2. Cordless power tools are required unless the subcontractor can demonstrate a hardship or need to use tools with power cords. 3. The subcontractor is required to elevate off the ground all power cords in order to minimize tripping hazards on walking/working surfaces. 4. Debris is not allowed to be consolidated on the floor. MATERIAL HANDLING/ STORAGE: 1. Material may not be stored within 10 feet of the building perimeter or adjacent to shafts or stairwells. 2. All material laydown areas must be coordinated and designated by Turner. 3. Material must be stored to promote mobility of material. Pipes, conduits, metal fabrications and steel framing are to be stored on rolling racks or similar means of conveyance. Bulk material should be palletized to allow for easy mobility using a pallet jack. 4. Just in Time" delivery required to minimize clutter. Nothing should be stored on a floor that cannot be installed within one week. 5. Heavy material such as glass and drywall must be loaded so as not to overload the structure. The subcontractor is required to do a floor loading analysis for submission to Turner for review and approval.

Project Safety Staffing Policy

I. Policy Statement

Full time, project safety staff is required on all projects with a contract value in excess of $25 million dollars. It is recommended that the safety staff be assigned prior to the beginning of work, as with other site staff. Additional safety staff may be required when project size is greater than 75 million dollars or risk management plan dictates a need.

II. Roles and Responsibilities

This safety staff person should perform the following functions prior to and during the life of the project:

- Assist the Business Unit Safety Director (BUSD) in creating the site-specific safety program
- Setup and implement substance abuse testing
- Create and implement a project safety orientation
- Create and implement a project incentive program
- Attend pre-bid meetings to inform subcontractors of specific project safety requirements
- Establish safety pre-planning meetings with all subcontractors and assist the Project Staff in placing meeting times in the project schedule
- Meet with and coordinate response from local EMS officials
- Conduct project safety audits using the Predictive Solutions SafetyNet Reporting System
- Conduct toolbox safety meetings for Turner employees
- Establish and maintain site record keeping files
- Establish and encourage Project Staff safety auditing requirements
- Ensure that all precautions / requirements found in the environmental site assessment are complied with
- Other safety requirements as deemed necessary by the BUSD and / or Project Staff

Regulatory Inspection Procedure

I. Policy Statement

The purpose of this procedure is to provide guidance to Turner personnel on how to respond to any regulatory agency inspection on our projects. In addition, this procedure should be utilized for advance preparation for regulatory inspections.

II. Procedures

1. Turner will strive to maintain a positive working relationship with all regulatory agencies. By law, any regulatory agency or compliance officer (Authority) has the right to enter and inspect any place of employment during normal working hours. Also, by law, Turner has the right to deny entry into our project. It is Turner's policy NOT to deny entry and to fully cooperate with Regulatory Inspectors. The BUSD must be contacted if the project team intends to deny entry.

2. The Site Safety Manager or Project Superintendent should meet with the Authority to determine the nature of their visit and to verify credentials, if necessary.

3. The BUSD must be contacted immediately upon notification of a regulatory agency inspection. The Turner Risk Management Reporting Form should be used and is available in the safety section of the TKN2 Document Management System.

4. The CO or Authority has the right to enter any place of employment accompanied or assisted by outside engineers or specialists.

5. The CO or Authority is entitled to bring cameras, video equipment, tape recorders and other testing equipment that is required to perform their audit.

6. Turner has the right and duty to ensure the CO or Authority is escorted for safety, coordination and property protections. A CO must never be allowed on site without an escort.

7. Opening conference guidelines:

    - Ensure that the CO or Authority presents all of the required information in the opening conference.
    - Ask clarifying questions to thoroughly understand the nature of the inspection. If the inspection is due to a complaint, obtain a copy of the complaint letter.
    - Inquire how long the CO anticipates the inspection will take so you may estimate your time commitment and level of resources needed to support the inspection.
    - Verify if the CO or Authority will need to perform any sampling and ensure that action is monitored by a Turner Construction Staff Member.
    - Provide only the specific documentation requested.

8. Documentation – the following is a list of documentation that is often requested during a regulatory agency inspection:

    - Written Accident Prevention Program
    - Site Specific Safety and Health Program.
    - Subcontractor Accident Prevention Programs
    - OSHA 300 Log
    - Hazard Communication Program
    - Safety Committee Meeting minutes
    - Safety Training Records
    - CPR / First Aid Training Records

9. A Turner representative must remain with the CO or Authority at all times unless they request privacy for interviews with employees or management. Turner should remind employees that they are under no obligation to speak privately with a CO or Authority.

10. A CO or Authority may request certain documents and duplicate copies may be turned over with approval from the Business Unit Safety Director.

11. Discussions and negotiation regarding distribution of company confidential documents will involve the BUSD. All documentation with employee's names will be blackened out to protect confidentiality.

12. During the walk around portion of the inspection, all attempts to correct apparent violations should be made by Turner staff and/or the hazard creating subcontractor.

13. The CO or Authority will take photographs, videos and measurements during the walk around phase. The Turner representative must duplicate each photograph, video and measurement and document the circumstances concerning the alleged violation. Additional photographs should be taken at different angles to provide additional views.

14. Never admit guilt or volunteer any additional information than necessary to answer a question concerning an alleged violation.

15. During the closing conference, the CO or Authority will likely state if there will be a follow-up inspection from another agency and any apparent violations noted during the walk around phase.

16. All documentation must be forwarded to Turner Risk Management (via the Business Unit Safety Director) at the conclusion of the inspection.

Turner Construction Company
OSHA Inspection Form

Project:_____ Project No.:_____

Project Superintendent:_____

Project Safety Manager/Coordinator:_____

Inspection Dates & Times:_____
_____
_____

I. **Pre-Inspection**

A. Person & Title contacted by OSHA_____
_____

B. Did inspector show his credentials? Yes ( ) No ( )
If No, comment:_____

C. Names of OSHA Inspector(s) and their Area Offices:_____
_____

D. What was the reason for the inspection:
1. Employee complaint? Yes ( ) No ( )
(If yes, attach copy. OSHA is required by law to give you a copy)
2. Random scheduled inspection? Yes ( ) No ( )
3. Other (comment):_____
_____

E. Did OSHA review record keeping: Yes ( ) No ( )

1. Required OSHA poster, was it posted? Yes ( ) No ( )
2. Turner's Project Safety Program Yes ( ) No ( )
3. OSHA Form #300: Yes ( ) No ( )
4. Minutes of Project Safety Meetings: Yes ( ) No ( )
5. Minutes of Weekly Tool Box Talks: Yes ( ) No ( )
6. Copies of Safety Coordinator Inspection Reports: Yes ( ) No ( )
7. Hazard Communication Program: Yes ( ) No ( )
8. Correspondence to contractors informing them to correct unsafe working conditions: Yes ( ) No ( )
9. Other (comments):_____
_____
_____
_____

II. **Opening Conference**

A. Names of Contractors, their representatives and titles:
(or attach a list) _____
_____
_____

Turner Construction Company
OSHA Inspection Form

III. **Inspection Tour**

A. Who from Turner accompanied the OSHA Inspector?_____

_____

Who else joined the OSHA Inspection Group?_____

_____

B. Did the Inspector take any photographs? Yes ( ) No ( )
Did Turner take the same photographs? Yes ( ) No ( )

C. Were safety hazards and unsafe acts observed? Yes ( ) No ( )
If Yes, what were they and who had responsibility?_____

_____

_____

D. Was immediate corrective action taken? Yes ( ) No ( )
If No, comments:_____

_____

E. Special comments regarding inspection:_____

_____

_____

IV. **Closing Conference**

A. Did OSHA hold closing conference with Turner? Yes ( ) No ( )
With other contractors? Yes ( ) No ( )

B. Names of contractors, their representatives & titles:
(or attach a list)_____

_____

C. What alleged OSHA Violations were discussed and with whom?
(or attach a list)_____

_____

Note: It is of the utmost importance that correct assignments of OSHA Violations are made at this time. Neglecting this shall cause contesting of citations that may be wrongfully issued to The Turner Construction Company.

_____ _____
Project Supt/Coordinator/Safety Manager Date

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

Orig: Business Unit Safety Director
cc: Business Unit Operations Manager
cc: Turner Risk Management (cdeprater@tcco.com, acboyd@tcco.com, rvargo@tcco.com)
cc: Compliance rpreiss@pecklaw.com

Safety Enforcement Penalty Guidelines

I. Policy Statement

To assist in Turner's efforts to provide a safe workplace, the following violations and penalties associated with them are to be included and enforced on all projects, at the discretion of the local Business Unit. Once implemented they cannot be removed.

	Turner Employees	Subcontractor Employees
1. No Hard Hat	1st Offense - Written Warning 2nd Offense – Discharge	$500.00 Fine
2. No Safety Glasses	1st Offense - Written Warning 2nd Offense - Discharge	$500.00 Fine
3. Remove Guardrail Protection Without Replacement	Discharge	$2,500.00 Fine
4. Remove Opening Protection Without Adequate Replacement	Discharge	$2,500.00 Fine
5. Unsecured Compressed Gas Cylinders	----------	$1,000.00 Fine
6. Concrete coring holes in deck left unprotected.	1st Offense - Written Warning 2nd Offense - Discharge	$300.00 per hole
7. Open Electric Panels	----------	$1,000.00 Fine
8. No Fall Prevention	Discharge	$5,000.00 Fine
9. Other violations	Discharge	$500.00 Fine

Project signage outlining this policy is to be created and conspicuously displayed at your job site. Fines collected shall be added to the project safety recognition program. Fines will be assessed to the Employee's company regardless of whether the individual is discharged. Any fines collected may only be used for the project's safety incentive program.

NOTE: The above Penalty Program is only a sample and a job site-specific program should be written into each subcontract. Copies of the policy shall be given to the Turner Business Unit Director of Safety and Loss Control for approval.

SafetyNet Operational Guidelines

I. Statement of Purpose:

SafetyNet allows Turner to continuously monitor leading risk indicators and trends to prevent accidents in the making. By shifting focus onto needed training areas, and consistently rolling up and using timely information on unsafe conditions, we are able to successfully reduce incident and accident rates on our projects.

SafetyNet Goals:

- **Zero Injury Projects:** Using leading indicator data from SafetyNet, foster proactive risk management and safety processes on site and most importantly, send workers home safely each day.
- **Increased Profit through Lowered Injury and Insurance Costs:** The reduction of recordable injury and Experience Modification Rates (EMR) can simultaneously lower insurance costs and create a more advantageous position in bidding situations.
- **Avoid Unwanted Expenses:** By minimizing or eliminating the likelihood of OSHA or other regulatory fines, as well as civil lawsuits, companies can avoid unwanted expenses and the associated negative publicity.
- **Accurately Assess and Evaluate Sub-contractors:** Continuously monitoring sub-contractor performance is the key to pinpointing areas of improvement, identifying troubled sub-contractors and preventing worker injuries.
- **Increase Stakeholder Recognition as a Company that is Committed to Safety:** Use SafetyNet Data to more effectively differentiate Turner from our competitors in terms of culture, action and leadership.

***SafetyNet* Construction Results:** The *SafetyNet* system reinforces individual participation and competency. By urging participants to focus on the positive dimensions of job site safety in addition to those areas requiring action, an unbiased portrait of the safety landscape can be generated. The result is a realistic appraisal of current jobsite safety conditions based on leading risk indicators that point you to specific focus areas for improvement and training.

- **Benchmark Your Project's and Subcontractors' Performance:** By ascertaining your current safety performance-against other Business Units, you can determine areas where training is needed, or recognize excellence in your effort to continuously improve business processes. You can also benchmark your sub-contractors' performance across different projects and against other sub-contractors and use the findings to create an effective model for predicting and preventing claims.

- **Quickly Identify Negative Trends before Incidents or Accidents Occur:** Capture real-time observations as issues occur. Historical data is now a resource for identifying trends that can provide leading risk indicators.

- **Documented Evidence of a Proactive Safety Program:** Scheduled and consistent reports ranging from Project Summary, Contractor Analysis to Benchmarking reports help you present and share information in a concise, condensed format, ensuring that all parties are aware of open issues and trouble areas while there is still time to take preventative action. Documentation of completed safety inspections and associated reports also provide evidence that you are in compliance with OSHA and other regulatory guidelines.

- **Quickly Identify Negative Trends before Incidents or Accidents Occur:** Capture real-time observations minutes after occurrence. Historical data that previously served no purpose beyond the individual safety meeting is now a source for identifying trends that can provide leading risk indicators across the project or your entire company.

- **Increase Accountability:** Observations can be linked to individuals companies, work areas or projects, allowing leadership to track participation, competency and consistency. Using advanced analytics and automatic report distribution, *SafetyNet* allows management to have up-to-the-minute results without the administrative costs or time delays.

II. Procedures

It is the responsibility of the Business Unit Safety Director and the Operations Manager to ensure SafetyNet is fully implemented and used with in their organization. The SafetyNet link and new user request link can be found on TKN2 at Turner Resources / Safety. Specific requirements shall be detailed in the Business Unit Annual Action Plan. Below is a recommended protocol.

1. Minimal recommended auditing requirements are as follows:

    a) Project Executives / Mangers – 1 inspection per project per month.

    b) Business Unit Safety Directors
        - Monthly inspections for each project
        - Projects in the following phases of work require monthly reports; excavation, superstructures and exterior walls

    c) Superintendents – weekly inspections

    d) Project Safety Managers
        - 1 project – 3 inspections per week
        - 2-4 projects – 1 inspection per project per week.
        - 5-10 projects – 2 inspections per project per month.

2. Proactive Data Management: The BUSD is responsible to ensure the program is operating efficiently. The following is a sample of the reports that are available for their use:

    a) Project/Contractor/Observer Summary Reports: Details number of inspections and observations for project/contractor/user, including quantity and severity of unsafe observations and index score.

    b) Open Issue Report: Allows for proactive management of issues identified

c) Summary Report: Allows for detailed investigation of findings. Safe/Unsafe by category.

Safety Roles and Responsibilities

Effective implementation of the Turner Construction Company's Comprehensive Safety Resource Manual requires teamwork. The Company's senior management is committed to fulfill this program through each and every Business Unit. The following outlines the role of each.

Business Unit General Manager

- Implement a culture for establishing a positive attitude towards safety by all Turner personnel.
- Ensure Business Development Manager's compliance with Turner's safety program and policies.
- Ensure compliance reporting requirements are met for regulatory inspections.
- Market Turner's safety program to owners.
- Ensure Operation Manager's compliance with Turner's safety program and policies.
- Ensure adequate funding for the safety program.
- Participate in safety related programs.
- Begin all senior staff meetings with a discussion of safety.

Operations Manager

- Maintain an environment where safety is a core value.
- Ensure cooperation and support of the Business Unit Safety Director by all staff.
- Make safety attitude, management and implementation a primary focus on performance evaluations.
- Develop a procedure to establish consistency of safety evaluations of key personnel, including management, engineering and field staff, from project-to-project.
- Review safety at all Operation Review Meetings.
- Ensure that all personnel are given clear job descriptions and performance criteria, including adequate and proper training to implement Turner's safety policies as required by their job responsibilities.
- Participate in safety related training programs. Keep current on new legislative policies for OSHA, and new Turner policies and requirements.
- Require full use of the SafetyNet inspection program by Business Unit to include OM, PX, PM, Superintendent, PE, and all safety staff.
- Ensure that a full time project safety manager is assigned to all projects with a contract value $25 Million or greater.

Business Unit Safety Director

- Walk the jobsite before construction begins and understand the history of the site to identify potential environmental hazards.
- Ensure receipt of a comprehensive Phase I (and Phase II if appropriate) Environmental Site Assessment and pre-demolition survey prior to signing the contract.
- Establish and implement a site-specific safety program for the Business Unit.
- Establish and implement emergency evacuation and crisis management programs for the Business Unit and project sites, and monitor project site programs.
- Monitor overall construction safety performance through project management, SPD managers and staff.
- Ensure procedures are established and maintained to provide a safe work site, and written reports are completed in a timely manner.
- Monitor and inspect each project monthly using the SafetyNet system. (See Section 2, SafetyNet Operational Guideline

- Ensure that corrective actions have been implemented for all hazards noted by insurance carriers, Turner staff, local, state and federal agencies or others.
- Attend senior staff meetings to report on/review safety and environmental issues.
- Attend progress meetings or safety meetings as requested or deemed necessary.
- Review accident, safety and environmental reports, investigate all serious/fatal and/or catastrophic accidents, notify appropriate parties, and maintain permanent file.
- Establish and make available safety and environmental training.
- Maintain safety and environmental reference materials.
- Provide projects with necessary reporting forms and posters.
- Establish and maintain liaison with insurance carriers for loss prevention and claims service.
- Establish and maintain liaison with appropriate local, state or federal agencies.
- Implement Turner Risk Management initiatives per Safety Action Planning each year.
- Coordinate all responses to mold or moisture intrusion events.
- Read all contracts for scopes of work as they pertain to safety and loss control. The BUSD should review all safety additional provisions. In addition, the BUSD must read and approve all SAR's.

Chief Estimator

- Ensure an adequate safety budget, including cost for Business Unit Safety Director and specific line items for safety management depending on project exposures.
- Verify the owner has included an environmental survey in project documents, and obtain copies of all pertinent reports, documents, etc.
- Discuss and review site specific safety requirements with the Project Management and Turner's Safety Director.
- Coordinate with the Purchasing Department and the Business Unit Safety Director on the scope of safety requirements and how they will be purchased.

Purchasing Manager

- Before a quote is accepted from a subcontractor, ensure that the sub has submitted their current safety qualification information and have an EMR of 1.0 or less. If greater than 1.0, evaluate risks associated with each contractor and include money and resources to manage that risk.
- Ensure that the subcontractors meet with the Business Unit Safety Director, who must approve the subcontractor's safety program before start of work.
- Ensure that Turner Construction receives proof that all sub tier EMR's do not exceed 1.0.
- Ensure subcontractors have all the appropriate insurance (including Workmen's Compensation for rented labor or piece workers), by obtaining certificates of insurance. Also, implement a program to manage the expiration dates with ample time to receive current certificates without impacting project performance.
- Ensure all appropriate Exhibits are included in the contract, i.e. specific project hazards, drug and alcohol testing, and mitigation measures.
- Ensure the on-site safety program is included in the subcontractors' bid and contract documents.
- Implement a proactive subcontractor evaluation program with safety performance being one of the primary evaluation criteria.
- Coordinate with the Estimating Department and the Business Unit Safety Director on the scope of safety requirements and how they will be purchased.
- Coordinate all scopes of work that pertain to safety and loss control with the BUSD.

Project Executive/ Project Manager

- Work with the pre-construction team to ensure an adequate safety budget is estimated.

- During project set-up, evaluate specific project exposures and risks. Implement safety-preplanning programs to properly mitigate risks during subcontract buy-out. Involve insurance companies and Business Unit Safety Director in project preplanning activities.
- Conduct pre-construction staff meetings establishing goals and responsibilities, in addition to reemphasizing Turner's mission to be the leader in construction safety.
- Include field staff early on in projects to review for safety concerns during the preplanning phase.
- Ensure a member of the project Sr. Management Team (Project Manager or higher) conducts a monthly safety inspection and makes a written report to the Business Unit Safety Director.
- Work with the Business Development Department to ensure that a Phase I Environmental Study is conducted on all potential new work.
- Ensure project staff is completing required safety responsibilities throughout the duration of the project.
- Participate in safety related training programs. Keep current on all new legislative policies for OSHA and new Turner polices and requirements.
- Lead by example.

Business Development Manager

- Notify Business Unit Safety Director of potential project pursuits.
- Walk the jobsite before construction begins and understand the history of the site to identify potential environmental hazards.
- Ensure the Owner provides a comprehensive Phase I (and Phase II if appropriate) Environmental Site Assessment and pre-demolition survey prior to signing the contract.
- Proactively market the need for an effective safety program and adequate budget in selling new work. Help the client to understand that safety pays in cost, time, and quality of construction.
- Inform Owner of Turner's Environmental Policies.
- Add Business Unit Safety Director to the distribution list of both one (1) and 1-A meetings.

Project Superintendent

- Responsible for taking leadership role on their project and for implementing Turner's safety policies and procedures.
- Review subcontractors' competent person qualifications (resume) and discuss with BUSD to assure subcontractor is properly staffing project.
- Supervise, manage and require compliance to the site specific safety program by all personnel working on the project.
- Conduct pre-construction safety meetings with all subcontractors prior to their start of work.
- Conduct preplanning safety meetings prior to the start of new phases of construction.
- Participate in the development of the Site Specific Project Safety Program, Fire Prevention and Protection Program, Crisis Management Program, and additional safety programs as required.
- Create a Site Logistics Plan for the project.
- Set up the project trailer/office to be compliant with federal, state and local regulations.
- Provide the project trailer/office with a first aid kit, fire extinguishers, exit signs, and an evacuation route.
- Ensure all Turner and Subcontractor's staff completes project safety orientation prior to beginning work.
- Conduct and document a weekly safety inspection using SafetyNet.
- Ensure compliance with Turner pre-task planning (PTP) requirements.
- Assume overall responsibility for job site safety. If needed, appoint a qualified individual to be the safety coordinator.
- Conduct monthly project safety meetings and weekly coordination meetings with safety as the first topic of discussion. Subjects for discussion should cover but not be limited to:

  - Superintendents' observations regarding safety.
  - Reports of the Project Safety Manager and actions taken on any recommendations
  - Accidents which have occurred during the past month and methods of eliminating or protecting against them.
  - Conditions and/or actions that may affect the public and methods for correcting them.
  - Identify critical safety work activities.
  - Issue safety information to job staff, foremen and subcontractors once a month concerning safety subjects pertinent to the job.

- Require that each Turner and Subcontractor's foreman hold a Tool Box Safety Meeting with their crew at least once each week to discuss the following:
  - Minutes of staff safety meeting as they affect the work.
  - Instruct the employees in safe and efficient planning of their work.
  - The safety subject assigned at the staff safety meeting; safety subjects shall be pertinent to the current work activity.
  - Injuries or near misses that have occurred to their employees.
  - Solicit comments and suggestions relating to safety.
  - Minutes shall include dates and signatures.

- Require all subcontractors to provide their employees with the proper safety equipment required by the site specific safety program, and federal, state and local requirements.
- Require all subcontractors with non-English speaking employees to have a translator on site any time workers are present.
- Complete the monthly safety report and submit it to the Business Unit Safety Director by the fifth day of each month for the prior month.

Project Safety Manager

- Perform a minimum of three safety inspection of the project each week using SafetyNet.
- Ensure that all recommendations noted are corrected immediately, and noted in a timely fashion using SafetyNet.
- Review and comment on pre-task plans completed by Turner and subcontractors.
- Distribute and post safety information.
- Maintain First Aid equipment – inspect the First Aid Kit weekly.
- Monitor the Site Specific Safety Program.
- Assist in the investigation of all accidents, including those of Subcontractors. Submit a written report, and copy the Business Unit Safety Director.
- Keep current on all new legislative policies for OSHA and new Turner polices and requirements.
- Establish a relationship with all relevant regulatory agencies that might inspect Turner projects, Escort compliance officers on walk, follow Turner polices and file required reports to the BUSD.

Safety Training and Education Policy

I. Policy Statement

Turner believes a key component in driving an injury free environment is to develop and maintain a well-trained work force that understands basic safety and health principles. The following are minimal requirements that must be met by all Turner employees.

II. Procedure

1. Required Course Work:

a) **New Employee Orientation** – **O**n **Day One,** the employee's supervisor shall provide critical safety and health training for all new or re-hired employees. Information provided shall include:
   i. Hazards associated with their job and proper ways to perform the task safely.
   ii. Chemical Management & Hazard Communication Program.
   iii. Emergency Response Procedures.
   iv. PPE Requirements

b) The Supervisor shall schedule a meeting with the Business Unit Safety Director to discuss the following key topics: Turner Construction Safety Policies, Developing an Injury Free Culture, and Turner Strategic Safety Objectives.

c) OSHA 30 - All Turner employees in safety sensitive positions are required to have a 30 hour card. It is preferred that Turner's web-based course is utilized to fulfill these requirements. Individual who already have a 30 hour card must take the Turner Web based OSHA 30 hour refresher (3-Year OSHA Refresher) course within the first six months of placement. All Turner Employees are required to take the refresher course once every three years.

d) Subcontractor Substance Abuse Testing & Reasonable Suspicion Training - All Turner employees that interact with subcontractor workforce are required to attend training and adhere to the corporate policy regarding prescreening, random, post incident, and reasonable suspicion drug abuse testing.

e) First Aid/CPR - All Turner employees who routinely are in the field are required to maintain an active CPR/FA card.

f) SafetyNet Auditing System - All Turner employees who are routinely in the field are required to attend the SafetyNet overview training and may be required to perform compliance audits at their assigned jobsite.

g) OSHA Specific Training - When needed, individuals will be required to attend specific training that will enable Turner to be fully compliant with all applicable regulations. Scaffolds, Traffic Safety, Fall Protection, Hoists/Cranes, are a few examples of specific training.

Section F

Construction Management Safety Policy

Policy for Site Safety Programs in Connection with "Pure" Construction Management Assignments

Introduction

This section of Turner's safety policy is intended to provide guidelines for a specific class of assignments that Turner may accept. Fundamentally, this section addresses projects on which Turner does **not** hold the Trade Contracts and is not performing actual onsite construction work with its own employees. In this section, we are referring to Projects on which Turner has **not** been engaged to perform the work itself, but has instead been engaged to provide "pure" construction management services. These guidelines are also applicable to projects on which Turner provides a) owner's representative services, b) construction management consulting services or c) program or project management services.

Overall Goal

Turner's core philosophy, that it only be involved in projects on which safe operations are conducted, will be Turner's goal for this class of projects as well. The policy guidelines herein are to be implemented when Turner performs on projects of the type described in the introduction to this section.

Specific Goals

1. To ensure that there is a clear and appropriate assignment of responsibility for Project Safety in connection with the particular project, whether it is by assignment to Turner, a consultant engaged by the Owner or by a contractor to the Owner. Remember, Turner should not accept assignment of service that it would not have the contractual authority to control and/or responsibly perform.

2. To ensure that the assignment of responsibility for safety related matters is clearly reflected in language included in Turner's Contract as well as each of the Trade Contractor's Contracts, including appropriate lines of communication. Whatever obligations Turner may have, if any, should be presented as defined tasks, and not an assumption of responsibility. Remember, as a pure construction manager, Turner's role is in providing specific services for the Owner, not to act as a general contractor.

3. To ensure, at a minimum, that the conditions on the Project are maintained in a safe manner to allow for a safe working environment for the Turner personnel assigned to that Project. The safety of Turner's personnel assigned to that Project would be viewed as a minimum standard, to be employed in situations in which an Owner has not engaged Turner to perform a broader safety role. Further, in conducting safety assessments from the stand point of Turner's personnel, it is recognized that such safety reviews will potentially identify deficiencies in the work performed by others, and these guidelines are intended to provide a program by which such deficiencies of the trade contractors are to be communicated.

4. To ensure that Turner properly fulfills the obligations that it has accepted in its contracts, which may be broader than addressing the safety of Turner personnel. By way of example, many CM contracts require Turner to inform the Owner when a Trade Contractor is not fulfilling its obligations under its trade contract with the Owner which would include any required safety responsibilities of the Trade Contractor.

Understanding the Source of Turner's Safety Obligations

There is a significant distinction between the operations of site safety programs in connection with Pure Construction Management Projects as distinguished from other assignments that Turner may accept. On Projects in which Turner (i) actually performs work through subcontractors under Contract to Turner, or (ii) has a work force on the Project, there may be little question as to Turner's responsibility with respect to providing the appropriate site safety assessments (other sections of the safety and health manual should be referenced for Turner's policy in this regard). However, unlike these other forms of agreement, the specific site safety obligations of Turner on Pure CM Projects, is often dictated by the specific obligations that Turner has accepted in connection with that particular Project. Those specific obligations are often unique to the particular assignment that Turner has accepted, and those obligations should be defined and established in the Contract between Turner and the client that engaged Turner to provide those services. Accordingly, the Business Development representative, or other person assigned to develop the contract between Turner and the Owner, should be familiar with these guidelines. An understanding of the obligations of Turner in this regard should be discussed with the project staff at the 1A meeting (internally) to ensure their full understanding of the contractual responsibilities.

The specific role of Turner, as defined in the contract, will likely operate in one of three general categories, which will be discussed below. This section of the policy will also provide guidelines for the particular onsite safety program that Turner is to utilize in each of those three separate different programs.

The Terms of the "Pure Construction Management" Agreement

As a General Contractor, Turner's responsibilities for safety are not necessarily derivative of specific language in the Construction Contract. On Pure Construction Management Projects, which these guidelines are addressing, Turner's specific responsibilities are established by the tasks and services assigned to the Pure Construction Manager under that agreement. Therefore, it is essential that Turner personnel ensure that there is no question, and that there is no lack of clarity, as to the responsibilities of Turner with respect to the safety issues in connection with that particular project. The contract should clearly define these obligations.

Three General Contract Scenarios as they Relate to Safety on Pure CM Projects

The terms of the relevant Construction Management Agreement will likely result in Turner's responsibilities being viewed in one of three general approaches. They are as follows:

Scenario 1. A Project in which Turner has accepted obligations to perform site safety in connection with the Project;

Scenario 2. A Project in which the Owner has engaged an outside consultant to perform site safety obligations; or

Scenario 3. A Project in which the Owner has utilized neither approach 1 or 2.

The Policy for each Scenario

This section of the guidelines will proceed to address the general issues with respect to development of Turner's Contract that should be considered with respect to each of these three separate scenarios.

Scenario 1- This is the scenario in which Turner has accepted the obligation to perform site safety services in connection with the Project, including Project safety inspections and reporting. It is important to recognize that in connection with Pure Construction Management Projects, in accepting the responsibility to perform site safety services for an Owner, there is a key distinction. Turner may be accepting responsibility to provide site safety inspections and reporting, however that is different from accepting broad responsibility for safety in connection with the Project. As a pure CM, Turner's role must be limited to site safety inspections and reporting functions. Turner cannot accept responsibility for supervision of the various Trade Contractors and their employees, since the contractors are hired directly by the owner. Except in the rarest of instances, the responsibility to supervise or direct a specific construction worker will remain with the particular Trade Contractor. The responsibility to direct a Trade Contractor will remain with the Owner. It is very much unusual, if not unheard of, for the pure construction manager to have an obligation that extends so far as to supervise the workers on site. As a result, Turner can only accept the obligation to perform certain specific tasks and functions that are limited to conducting site safety inspections, monitoring, reporting, or other similar tasks. These tasks are separate and distinct from simply accepting responsibility to actually implement Project safety measures. The implementation of the safety measures must remain with the Trade Contractors, as they are the only participants in the project that have a workforce present.

An example of the distinction is as follows: Assume that a particular Trade Contractor is not installing temporary barricades as may be appropriate. Since Turner does not have a work force on site, as Turner is in a pure CM role, Turner cannot install the temporary barricades. The only construction workers on the Project that may do so are those that are employed by the particular Trade Contractor. Additionally, Turner will likely not have the authority under its contract with the Owner to expend the Owner's money and/or to direct the employees of the particular Trade Contractor to install the particular barricades. This is not to say that Turner would have no means available to it to seek and pursue redress of the circumstance. However, it must be recognized that Turner's means of seeking and pursuing redress is often limited to reporting the matter to the Owner, and, if the Contract so provides, to simultaneously provide informational notice directly to the responsible Trade Contractor. Only if the Contract so permits may Turner provide a directive to the particular Trade Contractor to correct the situation.

It is critical to understand this distinction and Turner's role for four key reasons:

1. Turner can only accept certain safety tasks, as opposed to accepting responsibility for safety. The former is accepting the obligation to perform a professional service, while the latter is one of taking the risk and responsibility without regard to whether Turner has the authority or ability to take necessary action. The latter is unworkable.

2. It is important that Turner not create a circumstance in which Turner acts beyond the authority granted to Turner under the relevant Contract. If the Owner has not empowered Turner to issue directions to the Trade Contractor, Turner cannot do so. If Turner is empowered by the Contract with the Owner to issue directions to the Trade Contractor, such directions should be limited to the scope of empowerment contained in the Contract and the Owner should always be provided a copy of such directions.

3. The other participants must be obligated by the Owner to follow and implement the safety related programs and procedures that are required by their Trade Contract and to address safety related deficiencies or non-compliance.

As stated, Turner does not have a workforce on the project, so it is essential that those in a position to take necessary or proposed action be obligated to do so.

4. Turner should not dictate the means and methods by which a Trade Contractor safely performs its work. In no event should Turner be directing the work of an individual tradesperson. Any communications with a Trade Contractor regarding a safety issue should involve that particular Trade Contractor's management personnel (which may include its foreman, project manager, etc.).

As stated above, Turner Business Development has a vital role in incorporating clear language in the Contract defining Turner's role in providing the site safety services in connection with the Project. That language should address the fundamental issues of defining:

1) Those services or tasks Turner is to perform,

2) Turner's authority in issuing informational directions or instructions to a contractor (and any limitations regarding same),

3) Confirming that Turner is not a controlling employer,

4) Ensuring that the Owner agrees to contractually require the other participant(s) in the project to take action consistent with the Project Safety Policy, Turner's internal policies and as necessary to ensure a safe project.

This will typically include requiring that an Owner obligate its Trade Contractors to:

1) Provide own specific Trade Contractor's Safety Program. Such program shall at a minimum incorporate the safety requirements outlined in the contract documents. The Trade Contractor's Safety Program shall address in detail the specific means, methods and circumstances of its work.

2) Immediately correct and address every safety issue or non-compliance that may be identified either directly by the Owner, by the Owner through Turner, or by Turner as it relates to non-compliance with a contractual obligation or safety of Turner personnel.

3) To follow any safety related directives that may be issued during the course of the project either directly by the Owner, by the Owner through Turner or by Turner to the extent the Owner has expressly retained Turner for such service.

In scenario 1, Turner is being engaged to provide site safety services. **Exhibit A** is a sample list of the specific services that Turner may be providing in scenario 1 (Sample List of Safety Services). Those specific services that are selected by the Owner should be included in the Contract, typically as an exhibit. Turner's role should be limited to those the performance of those services selected and included in the Contract exhibit. As a result, there will be no question as to Turner's role and function with respect to Project safety. Note that these services are defined tasks. As stated above, there should not be a broad assumption of responsibilities; only acceptance of the obligation to perform this specific and limited safety related tasks. It is equally important to clearly set forth, both in Turner's Contract and that of the Trade Contractors, the procedures and timing regarding the communication of the services provided and the

authority regarding such communications. At a minimum, the Owner should be included concurrently in all communications involving the performance of these services.

In implementing Turner's obligations in Scenario 1, it will often be required that Turner prepares a draft site safety program for the Owner to review/approve and implement in connection with the project. **Exhibit B** is a sample program that could serve as a template for developing such a program. Naturally, the program provided in this attachment should be reviewed and modified to address the particular needs of the proposed project. Please note that such a site safety program will be the Project Safety Program and should not be referred to as "Turner's Project Safety Program".

Scenario 2 – Scenario 2 is a situation in which, instead of the Owner engaging Turner to provide a site safety function, the Owner has agreed to engage an outside consultant (hired directly by the Owner), to address site safety issues in connection with the Project. In this situation, Turner would look for specific language to be included in the Agreement whereby it is acknowledged that the Owner has engaged a separate consultant for the purpose of conducting site safety assessments and reporting in connection with the Project, and that this responsibility and obligation has not been assumed by Turner as it is being performed by others.

It is recommended that when Turner operates on a Project on which the Owner has engaged a separate consultant, that there be a clear understanding, preferably expressed in the Contract, identifying how the Owner wishes to communicate and address the issues presented by the Owner's safety consultant. For example, assume that the safety consultant has discovered a situation in which temporary barricades are not installed. What then is to occur? Is the site safety consultant to distribute its reports to the Trade Contractors? Is the Owner to distribute that report? Is the Owner to issue directives with respect to addressing those issues? Is Turner to issue that directive (and if so, does Turner have the contractual authority to do so)? These questions should be clarified and defined in the Agreement between Turner and the Owner.

There should be clear language in Turner's Contract with the Owner and the Trade Contracts acknowledging that Turner has not assumed any role in connection with site safety, as others have assumed this function. That language should further acknowledge that Turner is neither the controlling employer on the Project, nor has Turner assumed any role supervising the work of the Trade Contractors or their personnel. Nevertheless, in circumstances in which the Owner has engaged an outside site safety consultant, Turner's policy is one of Turner exercising the limited role of conducting inspections to assess the safety of Turner personnel assigned to that Project. Therefore, language should be included to allow Turner to communicate any safety concerns for its employees directly to the outside safety consultant for appropriate action by the consultant. The procedures to be followed by Turner in connection with Scenario 2 are provided in **Exhibit C** (Scenarios 2 and 3 - Guidelines for Site Walkthroughs and Reporting).

Should Turner conclude that the outside consultant engaged by the Owner is not performing its services in a manner that Turner views as adequate from the stand point of safety of Turner personnel, Turner may request more frequent inspections of the Project site by the Business Unit Safety Director. Turner's policy will be for the Project personnel to contact the Business Unit's Operations Manager for appropriate review of the relevant Contract terms so as to appropriately address any concerns with the Owner and the General Manager. Additionally, attached hereto as **Exhibit B,** is a safety program that Turner recommends as a minimum standard for inclusion and implementation in the contract that the Owner will utilize with respect to its outside consultant and the Trade Contractors. It is recommended that whenever possible these criteria be provided to the Owner for the purpose of helping assure that no less than these criteria are utilized by the Owner in its engagement of the outside safety consultant and the Trade Contractors.

Scenario 3 – As mentioned above, Scenario 3 is the circumstance in which the Owner has not engaged Turner to perform a broad safety inspection, nor has the Owner engaged an outside Safety Consultant to do so.

The key point to recognize in Scenarios 1 and 2 is that there is specific language in the Contract defining whom it is that will be providing the Site Safety Function in connection with the Project. Despite the best intentions, Owners may not be willing to accept specific language defining who it may be that has that particular responsibility. Accordingly, Scenario 3 is intended to address the circumstance in which there is no such specific designation of responsibility.

In such circumstances, the policy of Turner is to assure that the Contract includes language acknowledging the fact that Turner has not assumed such responsibility. In this context, Turner's policy is one of assuring that its contracts include specific language whereby the Owner acknowledges that Turner has not been engaged to perform any site safety monitoring, inspections, or other safety functions or oversight services in connection with the project. That language should specifically acknowledge that Turner does not have any role or responsibility with respect to the supervision of the Trade Contractor's work on the project, or the supervision of the personnel employed by the Trade Contractors. Business Development is to ensure this language is included prior to signing a contract.

Turner's policy remains, however, one of assuring the safety of Turner's personnel assigned to that project. Additionally, it is recognized that incidental to Turner's performance of the Project Safety Monitoring for the safety of Turner's personnel, Turner's Safety Managers may discover deficiencies in the Trade Contractor's safety performance. The policy of Turner as to how best to address such deficiencies that may be discovered under this Scenario 3 is set forth in guidelines found in **Exhibit C** (Scenarios 2 and 3 - Guidelines for Site Walkthroughs and Reporting).

Other Scenarios and Concerns

One of the greatest issues involved in any safety program where Turner is a pure Construction Manager is how it is implemented in the field by Turner's personnel. It is of the utmost importance that the Turner staff on a project knows and abides by the requirements of the Contract regarding safety services. Significant liability may be incurred by Turner simply because a staff person acts outside of the services defined by the Contract. Actions that are taken by Turner personnel that are outside of the defined services may be considered to be unauthorized and potentially negligent. The lines of communication are equally important and should be strictly adhered to. Turner should not dictate the means and methods by which a Trade Contractor safely performs its work. In no event should Turner be directing the work of an individual tradesperson. To the extent the Contract authorizes Turner to communicate with a Trade Contractor regarding a safety issue; all such communications should involve that particular Trade Contractor's management personnel (which may include its foreman, project manager, etc.). Furthermore, the Owner should be included in all communications regarding safety on a Project. Understand that your actions may have the effect of waiving language in a Contract that otherwise may have protected Turner from additional liability.

In developing this policy, it is recognized that Owners may object to Turner taking action in accordance with the policies outlined for each of three scenarios set forth above. Naturally, it would be unrealistic for these guidelines to anticipate all variations of objections that an Owner may have. As a result, should an Owner refuse or object to Turner's employment of the policies set forth in these guidelines, that matter should be brought to the attention of the General Manager (to be addressed internally as may be appropriate) who shall dictate the approach to addressing that particular objection. Additionally, the fact that a client has objected to Turner so doing should be communicated to the SVP level, and to the SVP of Pre-construction Management, to aid in the recognition of this type of objection on this and future projects. Also this information shall be provided to the Operations Manager, Manager of Business Development, Business

Unit Safety Director, for consideration with respect to this and future contracts involving the particular clients. Should these issues arise prior to the execution of a Contract, these issues should be addressed in determining if Turner should accept an agreement or engagement with that particular client. It is recognized, however, that objections by clients may first arise after the contract is executed, and accordingly, appropriate assessment should take place to assure Turner's actions are consistent with Turner's contractual obligation with the Owner to the extent possible.

Section F

Exhibits

Exhibit A

Scenario 1 – Turner Providing Safety Services
Sample List of Safety Services

It must specifically state in the contract that although Turner has contracted to complete certain Safety functions, Turner is not assuming the role of the Controlling Contractor or a General Supervisory Role with respect to the Trade Contractors on the project.

The following list is not all-inclusive.

- Monthly Safety Walkthrough
- Project Staff Weekly Walkthrough
- Coordination of a Monthly or Weekly Safety Meeting
- Collection and Tracking of Weekly Contractor Toolbox Talks
- Providing Weekly Toolbox Talk Topics
- Coordination of Safety Pre-planning Meetings on an As Needed Basis
- Coordination of Daily Site Safety Efforts
- Development of an Owner Site Safety Program
- Development of Site Emergency /Evacuation Procedures
- Notification of Safety Deficiencies to Contractors following Inspections
- Coordination of Periodic OSHA Inspections
- Coordination of Periodic Insurance Carrier Inspections
- Coordination of Periodic Local Emergency Service Tours
- Development of an Incentive Program
- Coordination of Periodic Project Tours
- Development of Pedestrian Safety Policy
- Coordination of Site Contractor Safety Efforts
- Tracking of Incidents and Follow-up Correspondence

Exhibit B

Scenario 1 – Turner providing Safety Services
Sample Safety Program

Note: This is a sample Safety Program that is to be modified as appropriate for each specific project. The Business Unit Safety Director should be consulted to make this format specific to the project and add additional requirements as deemed necessary.

This sample, although developed for use when Turner has accepted certain safety related obligations, can be used as a reference in assessing the completeness of a program proposed by either a contractor or a safety consultant engaged by the Owner. This program sets forth the minimum acceptable standards for the Trade Contractor's Safety Program. It shall be the Trade Contractor's responsibility to develop and implement a written Safety Program, which addresses in detail the specific means, methods and circumstances of its work.

This Sample Safety Program, although drafted by Turner, should be reviewed/approved/modified by the Owner and implemented by the Owner for the Project as the Project Safety Program.

SAFETY IS EVERYONE'S CONCERN

The **[Owner/Project Name]** intends to adopt a proper and positive Incident Prevention Program requiring contractor, their subcontractors and suppliers to comply with the safety rules and regulations set forth in this Program.

This Safety Program, along with any additions or modifications that may become necessary during the life of the project, should assist in keeping incidents to a minimum throughout the construction process. This Program is to be used in conjunction with the Trade Contractor's own program.

All Trade Contractors and their employees engaged in work on this project must comply with all federal, state and local safety codes and regulations along with the recommendations of the **[Designated Safety Over-site Group]**. The Designated Safety Over-site Group shall consist of _____. [Fill in who is required by Contract to provide safety over site – i.e. the Owner, the Owner's safety Professional, Turner, etc.

We must realize that incident prevention is mandatory, beneficial to all, and the responsibility of every individual on this project, whether management, field staff, or any other position.

You, as an employer, have a responsibility to provide a safe and healthful work place for your employees, as well as others, in order to keep incidents to a minimum. **[Owner]** requests that you give your full support and cooperation to the Project Safety Program throughout the construction process.

RISK AND SAFETY MANAGEMENT

This safety program embodies the prevention of incidental injury, property damage, fire damage and hazardous product occupational illnesses. There is no feature of our work that is of greater importance. **[Owner]** recognizes that the prevention of incidents is imperative and it is our policy to provide a safe workplace. All Trade Contractors employed on the job are expected to conduct their work in a safe manner. Each Trade Contractor has a contractual obligation to perform their work using safe methods in order to eliminate injury to employees, the public and damage to property.

Congress has recognized the importance of incident prevention by enacting the Occupational Safety and Health Act of 1971. It is the responsibility of all employers to comply with these and any like regulations that may be imposed now or in the future.

PLANNING

The establishment of a pre-job safety-planning program for safety and hazard communication effectively prevents incidents. Awareness of potential loss-producing sources becomes a factor in the selection of work methods and equipment. This program will include, but not be limited to, the following essential steps:

1. Fact Finding -- Collect basic job information: methods, equipment, location, etc.

2. Analysis and Evaluation -- Spot potential sources of loss and determine priorities.

3. Pre-planning Meeting -- Alert staff of potential sources of loss and develop plan to control them.

4. Follow Through -- Strive to carry out the plan successfully.

GENERAL SAFETY PROGRAM

Incident prevention is the responsibility of each employee - neglecting safety is neglecting job responsibilities. The purpose of the safety program is to prevent incidents, outline duties and responsibilities of all parties, and to emphasize a plan for safety education to promote the identification and elimination of hazards.

The principles outlined in this program should provide a foundation for a safe working environment. Strict adherence to the intent of this program is to be considered a contractual requirement. Failure to comply could result in the **{Owner}** withholding payments.

Responsibilities of All Project Employees

- Perform work to prevent incidents to themselves, fellow workers, general public, and property.
- Alert supervisors to dangerous situations.
- Cooperation with principles of the Safety Program and all OSHA Federal, State and Local Codes and Regulations and their company's Safety Program.
- Safe utilization of all tools and equipment.
- Attend weekly Tool Box talks.
- Alert foremen immediately of any incident.

- Stop work if imminent danger exists. Imminent danger is where there is an obvious and observable condition that will likely cause great bodily harm/death and/or significant property damage.

Responsibilities of Trade Contractor's Safety Representative

In the absence of an assigned employee, the contractor's lead person, foreman, or superintendent onsite will automatically assume the responsibility.

- Assist the **[Designated Safety Over-site Group]** in the recognition and correction of hazardous situations.
- Conduct Tool Box Meetings on a weekly basis.
- Issue minutes of the Weekly Tool Box Meeting to the **[Designated Safety Over-site Group]** each week.
- Effectively utilize and train your employees in preplanning, recognition and correction of hazards.
- Report all safety related matters to the **[Designated Safety Over-site Group]**.
- Shall be responsible for Trade Contractor incident reporting.
- Provide a competent person and OSHA 30 Hour trained supervisor/employer on site whenever work is being performed.
- Ensure that all employees are trained in proper fall protection and are utilizing 100% tie-off at 6 feet and above.

Basic Principles of the Safety Program for All Trade Contractors

1. All project employees shall comply with Federal, State and Local Codes and Regulations.

2. Plan all work to eliminate or minimize personal injury or damage to employees or the public.

3. All Trade Contractors shall submit their company's Project Safety Program to the **[Designated Safety-Over-site Group]** in writing prior to the start of their work. This program shall list the positive steps the contractor intends to utilize for the prevention of incidents to their employees, other contractors and the public. As a minimum, the Trade Contractor's safety program shall incorporate all the basic principles of the **[Owner's Name]** Safety Program. The **{Owner}** reserves the right to withhold monthly progress payments if this requirement is not adhered to.

4. Trade Contractors shall provide their workers with all safety and personal protective equipment and tools and enforce their use as required by the safety program, Federal, State and Local Codes and Regulations.

5. Have a scheduled inspection and maintenance program for all tools and equipment and submit logs to the **[Designated Safety Over-site Group]** upon request.

6. Each Trade Contractor, regardless of tier, shall have at least one qualified first aid person present on the job. The name of the qualified first aid person and date of certification shall be submitted to the **[Designated Safety Over-site Group]** at the beginning of the project.

7. Each job shanty shall be equipped with at least a 20 lb. ABC fire extinguisher in good working order with prominent signage leading to location and an OSHA recommended first aid kit and each trade Superintendent or Foreman shall have an OSHA manual. Shanties with phones shall have posted telephone numbers of the following: A list of doctors, hospitals, ambulance service, fire department

and police department. If gang boxes are used in lieu of a shanty, the gang box shall contain an OSHA recommended first aid kit and OSHA manual, all to be furnished by the Trade Contractor.

8. Each Trade Contractor shall enforce the wearing of ANSI Z89.2-1971 approved hard hats and ANSI safety glasses during the total construction of this project and shall remove from project anyone from their forces not complying with this requirement.

9. All personnel shall wear shirts, long trousers and proper shoes at all times. No shorts, tennis shoes, tank tops, etc., will be permitted.

10. There are many safety factors involved with portable aluminum and other lightweight metal ladders. Metal ladders of any type and painted wooden ladders will not be permitted on this project. The only exception will be the metal ladders that are commonly used with steel erection. These ladders will only be allowed for work associated with the steel erection.

11. Each Trade Contractor is responsible for all of its subcontractor's and supplier's, regardless of tier, compliance with the Project Safety Program and all Federal, State and Local Codes and Regulations. Delivery personnel will not be allowed on the site without complying with these codes/regulations.

12. Any person not directly involved with the on-site construction of this project must not enter the site without first going to the **[Designated Safety Over-site Group]** job office and signing a visitor's release and obtaining a hard hat and safety glasses which is to be returned to the **[Designated Safety Over-site Group]** the same day.

13. Low velocity powder actuated tools only shall be permitted on this project. This is defined as that where the stud or pin has a velocity not in excess of 300 feet per second when measured 6-1/2 feet from the muzzle of the fastening tool. All operators of any powder-actuated tool must carry a current certification from the manufacturer of the tool in use.

14. Alcoholic beverages or illegal drugs shall not be permitted on this project.

15. Walkman type radios with earphones shall not be permitted on this project.

16. Trade Contractors shall supply cool drinking water for their employees, per OSHA Regulation 1926.51(a).

17. No contractor shall permit his employees to use another contractor's scaffold without written permission from the owner of the scaffold. All scaffolds shall be checked daily and before each use for safety compliance. No scaffold shall be left at any time in an unsafe condition and shall be removed immediately if not to be used again. Daily inspection logs must be presented to the **[Designated Safety Over-site Group]** upon request.

18. All extension cords, cables and hoses shall be maintained at least 8 feet above the working floor. Where this is impossible, these items shall be inspected daily for damage and repaired immediately or tagged and removed from use until repaired. Flat cords are prohibited.

19. No material shall be stored within 6 feet of a floor opening or 10 feet of the perimeter of the building. For assistance with storage location, contact the **[Designated Safety Over-site Group]**.

20. All equipment, materials, and debris shall be secured at all times or removed immediately to grade level, until the building is enclosed, to prevent windblown objects.

21. If for any reason, a contractor must remove cable, barricades or any other safety related item in order to perform his work, it shall be the responsibility for that contractor to replace them when the work is completed. Failure to comply with this directive shall result in the **[Owner]** having this work performed by others at the applicable Trade Contractor's expense.

22. Each Trade Contractor shall be responsible for maintaining general housekeeping on a daily basis in their work area and all debris shall be placed in debris containers.

23. All excavations/caisson holes shall be barricaded with flagging whenever left for any period of time. Flagging/barricades shall be maintained. Excavation to conform to OSHA regulations.

24. All exposed rebar shall be capped.

25. Jobsite trailers/shanties having stairs to doorways shall have a landing platform at the doorway that extends more than 20" beyond the swing radius of the door. Ensure ADA compliance related to access.

26. Any perimeter work where there is a chance for falling objects, sparks, etc., will require flagging/barricades below with a flagman or other overhead protection.

27. Cranes on the jobsite will be required to have capacity/swing/boom data present at all times. Trade Contractors are required to flag off the area of the boom/counter weight swing radius and provide an anti-two blocking device on the cable. Prior to use, the Trade Contractor must provide the **[Designated Safety Over site Group]** with an annual crane certification made by a competent person. Cranes shall be periodically inspected with logs presented to the **[Designated Safety Over-site Group]** upon request.

28. Trade Contractors are provide coordination and confirmation of loading requirements prior to loading floors with materials to be assured of conforming to construction load maximums.

29. All work performed in or adjacent to public spaces will be required to have barricades furnished and installed by the Trade Contractor separating the public from the work. Warning signs shall be posted so as to inform the public of hazards. Flagmen are to be provided when necessary. All public areas are to be kept clean/clear of debris at all times.

30. For emergency purposes, each contractor shall submit a list to the **[Designated Safety Over-site Group]** of key personnel, with home addresses and telephone numbers.

31. All chemicals to be used on this Project that have been determined to be hazardous under the Federal Hazard Communications Standard, 1926.59 shall be labeled and accompanied by a Safety Data Sheet (SDS). The **[Designated Safety Over-site Group]** shall receive a copy of the SDS for these chemicals immediately upon their delivery to the Project. Hazard Communication is further addressed in this program.

32. OSHA Standards require that all sources of energy (electrical, mechanical, hydraulic, pneumatic, kinetic) be brought to a "zero energy state" before work is done on equipment. All contractors are to follow the new Lockout/Tagout Standard, 1926.417. Trade Contractors are responsible for training their employees. Trade Contractors are responsible to notify other contractors performing work in the area of any lockout/tagout or to procedures to be followed and provide **[Designated Safety Over-site Group]** with copies of such notifications.

33. Trade Contractors shall provide copies of all incident reports to the **[Designated Safety Over-site Group]** within 24 hours of the incident.

34. All trenching and excavation work shall comply with OSHA standard 29 CFR part 1926.650. Contractors who may expose their employees to the hazards of trenches or excavations shall provide a competent person by OSHA definition to inspect these areas to ensure compliance with the standards. The competent person will be on site whenever any work is being performed in trenches over 5'0".

35. Ground fault circuit interrupters (GFCIs) will be provided on all temporary electrical receptacles by the electrical contractor. The electrical contractor will inspect all ground fault circuit interrupters on a monthly basis. Damaged equipment shall be replaced. All electrical equipment and extension cords not protected by GFCIs shall be tested and color-coded in accordance with the OSHA Assured Grounding Program. Flat extension cords are not permitted on this project. All cords, tools, and equipment shall be inspected daily for damage and removed from service if damaged.

36. Proper sanitation facilities will be provided. Any person not using proper facilities will be immediately and permanently removed from the site. Hand washing facilities will be made available to all workers per OSHA 1926.

37. Any floor opening greater than 2" in diameter, but not larger than four square feet (4 SF) may be protected by a cleated plywood cover a minimum of 5/8" thickness or other equivalent means. The cover shall be clearly labeled "Floor Opening Do Not Remove." Protection must be secured from horizontal or vertical movement. Each Trade Contractor will be assigned a "color code" for their covers easily identified as belonging to that Trade Contactor.

38. Floor and roof openings larger than four square feet (4 SF) shall be protected by the contractor that created the opening, and the protection maintained until such a time that his forces are no longer on site. Contractors creating a floor or roof opening larger than four square feet (4 SF) shall be protected by the contractor that created that opening. This does not include protection during steel erection. Openings larger than four square feet shall be covered by one of the following methods:

    a) Guardrails and toe boards which meet OSHA requirements.

    b) A minimum 2" x 10" planking (nominal) completely covering the opening and extending a minimum of 6" beyond all sides, with additional support to be installed at spans over six feet (6') and secured from horizontal or vertical movement.

    c) Other methods which meet OSHA requirements.

39. It is understood that once a contractor begins his work directly above, below, or within eighteen inches (18") of a floor or perimeter opening, that contractor is to maintain the protection of that opening.

40. In renovation and/or alteration work, identification of unmarked pipes must be made prior to any demolition or work being performed.

41. All persons shall be protected from falls at a height of six feet via netting, guardrails, or personal fall arrest systems. All work and trades are included in this requirement. Any employee found not protected will be removed from the site. Any contractor found non-compliant three times will have their supervisor removed and replaced.

Safety Meetings

Safety will be a regular discussion item at the Weekly Contractor Coordination Meeting. All Trade Contractors shall have a representative present at this meeting.

Agenda for the safety portion of the meeting will be causes and corrections of incidents that have occurred since the last meeting, existing hazards in need of immediate correction, potential hazards involved in the work expected in the next two weeks, and methods of eliminating or protecting against them, and conditions and/or actions that may affect the public and premises, including occupants and methods for handling them.

Weekly Tool Box Talks

Each contractor shall hold Weekly Tool Box Talks. The Trade Contractor's Safety Representative shall chair talks. Weekly Tool Box Talk Minutes shall be copied to the **[Designated Safety Over-site Group]** each Friday by 3:00 P.M. The **[Owner]** reserves the right to withhold Monthly Progress Payments if minutes are not submitted.

The weekly minutes shall contain the following:

- Name of contractor and date.
- Name of contractor's safety representative.
- Printed name and signature of all employees attending and the name of the first aid person.
- Number of employees on their payroll that day.
- Subjects discussed.
- Safety observations and comments from employees.
- Injuries the previous week.
- Incidents or near misses the previous week.
- Scope of work for the week.

Just- in- time safety awareness training will be required when workers are not compliant with safety on the job.

Injury Reporting Requirements

If a contractor employee is injured:

- Each contractor shall make provisions for immediate and proper first aid and/or doctor treatment for every work injury of its employee. Injuries may be referred to the hospital emergency room.
- The **[Designated Safety Over-site Group]** is to be notified immediately of any incident.
- One copy of each incident report involving a contractor's employee shall be forwarded to the Owner and the **[Designated Safety Over-site Group]** within 24 hours.

- Trade Contractors will be individually responsible to notify Federal, State and Local authorities in the event of a fatality and/or multiple injuries requiring hospitalization (3 or more) within 8 hours of the time of the incident.

If a member of the public is injured:

- Immediately notify the **[Designated Safety Over-site Group]**.
- Send public liability report to your insurance carrier promptly and forward one copy of the report to the **[Designated Safety Over-site Group]**.

FIRE PREVENTION PROGRAM

Purpose

We are all aware of the dangers associated with fire and all employees have a vested interest in a fire prevention program. The following is a guide, in no way complete, setting forth, minimum standards to aid in preventing losses as a result of fires or gases associated with combustion.

The principles outlined in this program should provide a reasonable chance for a fire free job. Strict adherence to the intent of this program is to be considered a contractual requirement.

Shanties and Trailers

1. Shanties shall be constructed using only fire retardant materials and all glass shall be wired glass. As a minimum, any lumber used in shanty construction shall meet the American Wood Preserves Association's Standard C1, C20 and C27 and shall bear certificates of performance. Most local Fire Departments will not permit the use of flammable material for shanty construction, even before occupancy. Sprinklers may also be required. The Trade Contractor should be prepared to meet the Fire Department's requirements when constructing a field shanty.

2. All materials shall have a flame spread rating no greater than 25 (ASTM Standard E84) with no evidence of progressive combustion for at least 30 minutes.

3. All shanties shall be located at least 10 feet from materials that present extraordinary fire hazards.

4. Each shanty and gang box shall have at least one 20 lb. ABC fire extinguisher in good working order with prominent signage denoting location.

5. Rubbish shall not be permitted to accumulate within areas adjacent to any shanty.

6. No oily clothes, oily rags, or fuels shall be stored in shanties.

7. Shanties shall be constructed of flame retardant lumber.

8. Shanties shall be continually policed by their occupants to prevent accumulation of combustibles such as lunch wrappers and newspapers in and around their shanties.

9. Each shanty shall have a 55-gallon waste container adjacent to it.

10. Each shanty shall be heated with approved heating devices in accordance with applicable rules, regulations and laws. Electric space heaters must be monitored so as to insure that combustible materials are not placed near them creating the potential of fire.

Fire Prevention

1. All temporary electric must be in accordance with all existing codes.

2. Storage of any material within 10 feet of fire hydrants is strictly prohibited. All Fire Department Siamese connections/temporary standpipes must be kept clear at all times.

3. Work areas shall be policed on a regular basis to prevent accumulation of combustible materials.

4. No motors or machinery shall be left running unattended during non-working hours.

5. All heating equipment shall have necessary safety devices and shall be wired, piped and operated according to all applicable codes, rules and regulations. Ventilate as required to prevent carbon monoxide from accumulating.

6. All tarps and blankets shall be of fire retardant materials.

7. All fuel and solvent containers shall be placed on drip pans. All fuels and solvents will be stored per OSHA regulations.

8. No open burning or fires shall be permitted on site. Anyone doing so is subject to immediate dismissal.

9. No solid fuel (i.e., coke, etc.,) shall be permitted on the site.

10. Fire extinguishers shall be placed and maintained on the job in conspicuous locations. These fire extinguishers shall be not be moved or discharged except for fighting a fire. Anyone discharging an extinguisher as a prank will be subject to immediate dismissal and the applicable Trade Contractor will be held responsible for any damage or costs associated with this action.

11. Each Trade Contractor shall provide additional fire extinguishers when they are engaged in fire susceptible activities (i.e., welding and burning, heaters in use, tar kettles and paint storage).

12. Upon discharging of a fire extinguisher, notify the **[Designated Safety Over-site Group]** immediately so that proper steps can be performed to energize the extinguisher for future emergencies.

13. All gas bottles such as propane, oxygen and acetylene shall be stored and tied in a vertical position in areas designated by the **[Designated Safety Over-site Group]**. All stored bottles shall be capped. Propane shall not be stored indoors.

14. All gas bottles in use shall be tied in the vertical position and capped at the end of the working day.

15. All oxygen and acetylene in use shall be in proper carts with required separations.

16. During welding or cutting operations, a fire watch will be required and it shall be the responsibility of the contractor performing this work. Each welding cart must have an attached fire extinguisher. Non-asbestos blankets must be used to contain welding sparks. A thirty-minute post weld/cut fire watch is required.

17. All acetylene and fuel gas cylinders shall be separated from oxygen cylinders during storage by a minimum of 20 feet or by a non-combustible barrier of at least 5 feet high with a fire resistant rating of at least one half hour (ANSI Z49.1-1967).

Fire Fighting

Appropriate action is the key to the prevention of loss of life and property damage. This action in the first minute is worth tons of water 10 minutes later.

If a fire occurs, notify the local fire department (telephone number is posted at all phones) and the **[Designated Safety Over-site Group]**. Extinguish a small fire with non-combustibles such as sand or an available fire extinguisher.

Remove or shut off fuel supply if possible, such as removing debris or stored material or shutting off propane, etc.

Do not put yourself in danger trying to fight a fire for which you have not been trained. If evacuation is necessary, follow the emergency action plan set up on your project and meet outside building in designated area.

HAZARD COMMUNICATION PROGRAM

Purpose

The [Owner] has developed the Hazard Communication Program to be used on this project to insure that all of our employees are informed of the hazardous chemicals known to be present on the jobsite. All Trade Contractors, subcontractors, sub-subcontractors and suppliers shall comply with all Federal/State OSHA Hazard Communication Regulations CFR 1926.21 (3) and the Hazard Communication Final Rule dated August 24, 1987, CFR 1926.59 and CFR 1910.1200 if applicable. Each jobsite will have a copy of the Hazard Communication Standard on file.

Contractor's Responsibilities Are (But Are Not Limited To):

- Submit all Safety Data Sheets (SDSs) to the **[Designated Safety Over-site Group]** prior to use and bringing on site of the hazardous chemicals/materials.
- Must have all containers labeled with the OSHA required information for the container contents.
- Are fully responsible to train their own employees in their Hazard Communication Program.
- Keep own Hazard Communication records.
- Comply fully with the Federal/State Hazard Communication Program.
- Coordination between other trades

Safety Data Sheets (SDS)

Trade Contractors are to submit to the **[Designated Safety Over-site Group]** Safety Data Sheets (SDSs) for all hazardous chemicals/materials either going to be used or are being used on the jobsite. SDSs should be exchanged at the weekly Contractor Coordination meetings. The Trade Contractor is required to provide the **[Designated Safety Over-site Group]** with a SDS for any new material brought onto the site.

SDS Binder is required to be updated as new chemicals are introduced or at least one time per month. While all SDSs may not be uniform in appearance, they must convey the same message:

- Identification of the product.

- Known acute and chronic health effects and related health information (target organ effects).
- Exposure limits (Threshold Limit Value (TLV)).
- If the product is a suspected carcinogen.
- Personal protective equipment to be used.
- Emergency and First Aid procedures.
- Identification of the party responsible for the SDS.

Container Labeling

Trade Contractors will be monitored during delivery of their products to insure that all containers have OSHA required labels prior to being used. Mutilated labels shall be replaced with OSHA required labels. Unlabeled or mutilated labeled containers shall be removed from the jobsite if the labeling is not corrected within 72 hours from the delivery date. The contractor must label all secondary containers.

The Trade Contractor shall verify that all containers are clearly labeled as to contents; appropriate warnings noted; and names and addresses of manufacturers. Labels may be in writing, pictures, numerical systems or any combination of the aforementioned. The message must be understood as to the nature of the hazard, personal protective equipment needed, parts of the body affected, and emergency procedures.

Training of Contractor's Employees

Trade Contractors shall be responsible for the training for its employees as well and the employees of its subcontractors and vendors of all tiers. All training of new employees shall be performed prior to their starting work. The training should include the following:

- Overview of requirements of the Hazard Communication Standard and the location and general content of the Contractor's Hazard Communication Program.
- How to read and understand Safety Data Sheets (SDSs) and container/material labels. Where this information is located must be discussed.
- What hazardous materials they may be exposed to on the jobsite.
- What personal protective equipment must be used for various operations and how it will be used and maintained.

GROUND FAULT PROTECTION PROGRAM

Purpose

- To eliminate the hazards associated with electricity as it pertains to the use of power tools, cords, equipment, panels, etc.
- To outline the duties and responsibilities of all parties.
- To emphasize awareness and education of hazards associated with electricity and how to eliminate them thus preventing incidents.

Ground Fault Protection Program

The electrical contractor providing temporary electric services shall furnish and install 120V single phase 15 & 20 amp receptacles that have approved ground fault circuit interrupters for personnel protection complying with OSHA regulations part 1926.404 (b) (1) (ii) for all temporary electric.

The electrical contractor shall conduct monthly testing of all GFCIs and record as such. These records shall be made available for inspection by other contractors and the Owner.

All Trade Contractors are to verify that GFCIs are in proper working order prior to plugging into outlets. Any improper working devices are to be reported immediately to the **[Designated Safety Over-site Group]**.

The electrical contractor providing temporary electrical service is to respond immediately in the repair/replacement of improperly working devices.

The **[Owner]** does not accept an assured grounding program in lieu of GFCI usage, only in addition to.

Where permanent power is in use, a portable Ground Fault Circuit Interrupters will be used between the permanent power and the tool. The portable GFCI should be connected at the tool.

CONFINED SPACE PROGRAM

Purpose

The purpose of this section is to inform all contractors that work in these areas is critical and that proper procedures for confined spaces are to be followed.

Procedures/Responsibilities

The principle hazards in confined spaces are explosion, fire, and asphyxiation hazards. All contractors performing work in these areas are to follow confined space procedures as outlined by OSHA.

Trade Contractors shall be responsible for the training for its employees as well and the employees of its subcontractors and vendors of all tiers in the procedures pertaining to confined space work.

Trade Contractors are responsible for assuring that confined spaces are free of dangerous gases as indicated by an approved test device prior to entering the space. Tests are to be repeated at regular intervals to be assured that dangerous gases are not collecting in the confined space.

Trade Contractors are to provide proper ventilation as required for their employees during times when their employees are working in the confined space.

If space is identified to have explosive, fire or asphyxiation hazards over the OSHA action level or PEL a full permit required confined space program must be implemented.

EMERGENCY PROCEDURES

Emergency Telephone Numbers

Emergency telephone numbers will be distributed to all Trade Contractors at the first project meeting.

Severe Weather Policy

It is imperative to insure the safety of all employees that we have a designated meeting place and Action Plan to follow in case of severe weather. Every contractor's employee should be familiar with these procedures BEFORE severe weather actually occurs.

In the event of a tornado or severe weather requiring action, 3 blasts of a horn every 5 seconds will be sounded.

All personnel are to move to a protected area.

All personnel should evacuate the construction trailers.

Trade Contractor supervisors will be responsible for employee count to insure all personnel are present. So that everyone can be accounted for in these situations, always let your supervisor know when you are leaving your work area and where you are going.

Emergency Evacuation

If you feel there is a need to evacuate the building in the event of a serious fire, explosion, chemical spill, etc., ALERT MANAGEMENT IMMEDIATELY! Notify the **[Designated Safety Over-site Group]**, or any Supervisor available.

The evacuation signal will be a constant pulsating blast of a horn.

All personnel are to evacuate the building and proceed to the designated meeting place.

DO NOT PUSH, RUN OR PANIC.

Once evacuation of employees has been completed, no employee should attempt to re-enter the building until so instructed by the **[Designated Safety Over-site Group]**.

Trade Contractor supervisors are to be responsible for assuring all employees have been accounted for.

When working in existing facilities (hospitals, schools, plants) make sure you are familiar with the owners Emergency Action Plan and know how follow their plan.

SAFETY TRAINING FOR ALL CONTRACTORS

Purpose

- To inform all employees of the requirements of the Safety Program.
- To outline the safety duties and responsibilities of all parties on the project.
- To establish a mindset that puts safety as a foremost consideration in all aspects of the work.

Responsibility

It is the responsibility of each Trade Contractor to effectively train its employees, as well and the employees of its subcontractors and vendors of all tiers, in all aspects of safety and all points outlined in this program and federal, state, or local requirements.

FALL PROTECTION PROGRAM

All contractors must provide fall protection when working at heights of 6 feet or more.

Each contractor is responsible for protecting its own employees by using conventional means of fall protection such as standard guardrails or perimeter cable. The ongoing maintenance and daily inspection of this protection must also be included. If a contractor's employee cannot be protected by conventional methods, then adequate preplanning must be conducted to provide for anchorage points capable of withstanding 5000 lbs. and safety harnesses and shock absorbing lanyards for these employees. Perimeter protection is not designed to withstand 5000 lbs. but is designed for 200 lbs. Perimeter protection should not be used as an anchorage point unless it has been designed to withstand 5000 lbs.

All floor openings exceeding 2 inches in diameter shall be covered, barricaded, or otherwise properly protected. Covers shall be designed to withstand twice the weight of workers, equipment, and materials. Covers shall be secured against displacement horizontally and vertically. All covers shall be marked with the words "Floor Opening" or "**DO NOT REMOVE**".

Each contractor employee exposed to fall hazards must be trained by the contractor in the recognition of fall hazards, the avoidance of fall hazards, the purpose, use, and requirements of conventional fall protection methods, and the use, inspection, and care of safety harnesses and shock absorbing lanyards.

Since contractors are experts at their specialized trades, they shall provide the **[Designated Safety Over-site Group]** with their own Fall Prevention Program which describes the methods that they intend to use to provide adequate fall protection for each contractor's specific operations. Contractors are expected to provide the **[Designated Safety Over-site Group]** with documentation that their employees have been adequately trained to comply with Subpart M, and the six foot rule.

The following is a list of several work areas where fall protection would be required and an example of a type of protection that may be used.

EXPOSURE	CONTROLS
Unprotected sides and edges 6 feet or more above a lower level	Guardrail systems, safety nets, personal fall arrest systems, scaffolds, ladders, or aerial lifts.
Leading edges 6 feet or more above a lower level	Guardrail systems, safety nets, personal fall arrest systems, controlled access zones, scaffolds, ladders, or aerial lifts.
Hoist areas	If protection must be removed for a worker to reach out to receive the load then a personal fall arrest system shall be used.
Excavations exceeding 6 feet in depth	Guardrail systems, fences, or barricades.
Overhand brick laying	Guardrail systems, scaffolding, or personal fall arrest systems.
Roofing work on low-slope roofs	Guardrail systems, safety nets, personal fall arrest systems or warning line system.
Steep roofs	Guardrail systems with toe boards, safety net systems, or personal fall arrest systems.
Pre-cast concrete erection	Guardrail systems, safety net systems, or personal fall arrest systems.
Wall openings where the inside bottom edge is less than 39 inches from the inside walking/working surface.	Guardrail systems, safety net systems, or personal fall arrest systems.

Fall Protection Systems

Guardrail system consists of a top rail at approximately 42 inches, midrail approximately at 21 inches, and a toe board approximately 4 inches in height. If wire rope is used for top rails and midrails, its diameter must be 3/8 or ½ ". Wire rope must be flagged not less than every six feet.

Safety net system shall be installed as close to the walking/working surface as possible, but no more than 30 feet below such level. Safety nets shall be so installed with sufficient clearance underneath to prevent contact with the surface or structures.

Personal fall arrest system consists of a safety harness, lanyard with locking snap hooks, and an anchorage point capable of supporting at least 5000 pounds. A variety of other components can make up this system such as retractable lifelines, rope grabs, horizontal life lines, vertical life lines, shock absorbing lanyards, and a variety of anchor points such as belts, clips, prefabricated holes in steel, and chokers.

Warning line system is used mainly for the protection of roof edges. The warning line must be erected on all sides of the roof work area and not less than 6 feet from the roof edge.

CONCLUSION

All Trade Contractors are responsible for instructing their employees, as well and the employees of its subcontractors and vendors of all tiers, in the recognition and correction of unsafe conditions and the regulations applicable to their work environment to control or eliminate any hazards or other exposures to illness or injury.

Good safety practices carried out on this project will reduce possible incidents, which in turn will result in fewer dollars lost by the employers.

Neglecting safety is neglecting job responsibilities.

Please make it a point to implement the necessary procedures to assure a safe working environment for all employees on this job. Your cooperation is greatly appreciated.

When you have read the enclosed Safety Program, detach the following page and return it signed to the **[Designated Safety Over-site Group]**.

As is required, please enclose a written copy of your company's safety program that you intend to enforce in the performance of your work on this project.

TO: [Owner]

We have read and will abide by and comply with the Project Safety Program for the **[Owner Name]** projects. We will immediately correct any safety violations, including those noted by the **[Designated Safety Over-site Group]**, during the course of our work on this project. We realize that it is our obligation as an employer to provide a safe and healthful workplace.

A copy of our safety program is enclosed. Our program complies with all Federal, State and Local Codes and Regulations and incorporates the **[Owner's]** Safety Program as minimum requirements. A copy of our Safety Program shall be made available for and discussed with all of our project employees.

Name of Company	
Scope of Work	
Project Manager	Date
Superintendent/Foreman in Charge of Work	Date
Competent Person on Site	Date
First Aid/CPR Trained Employee	Date
30 Hour OSHA Certified Supervisor	Date

DETACH AND RETURN THIS PAGE

TRAINING CERTIFICATION SHEET

This certifies that I have been presented/read this Safety Program and understand all aspects outlined herein.

_____
Company Name

Name (please print)	Signature	Date

Exhibit C

Scenarios 2 and 3
Guidelines for Site Walkthroughs and Reporting

Guidelines for Project Staff and Safety Directors on Scenario 2 and 3 contracts whereby the Owner has hired an outside Safety Consultant to address site safety responsibilities, or the contract is one in which Turner has not accepted safety obligations.

1. Safety Directors shall visit the project once a month to conduct a safety walkthrough for the purpose of assessing and reporting to the Owner, or its representative, safety issues from the perspective of the safety of the Turner personnel assigned to the project. Although the walkthrough is intended to assess the safety of Turner personnel, if, during such a walkthrough, the Safety Director observes other potential safety risks (beyond the safety of Turner personnel), the Safety Director will note that deficiency in its report as well for the limited purpose of informing the Owner, or its representative, of such potential deficiency and for the Owner's action in addressing same. Safety Directors shall prepare a report of the walkthrough using the guidelines described in this Exhibit.

2. Should the Safety Director, following the walkthrough, conclude that an unusual risk of safety to Turner personnel exists on the project; the Safety Director may require that a member of the Turner project staff conduct walkthroughs with a frequency that the Safety Director may deem appropriate. A member of Turner's project staff shall conduct project safety walkthroughs as the Safety Director may require, for the purpose of assessing and reporting to the Owner, or its representative, safety issues from the perspective of the safety of the Turner personnel assigned to the project. If, during such a walkthrough, the Turner staff member observes other potential safety risks (beyond the safety of Turner personnel), the staff member will note that deficiency in its report as well for the limited purpose of informing the Owner, or its representative, of such potential deficiency and for the Owner's action in addressing same. Turner staff members shall, as the Safety Director may specify, prepare a report of the walkthrough and such report shall be prepared using the guidelines described in this Exhibit.

3. At the time that the Safety Director provides their first report, Turner project personnel should discuss with the Owner whether the Owner would prefer that Turner provide a copy of the report to the Trade Contactors and/or Owner's safety consultant on the Owner's behalf, or whether the Owner would prefer to distribute the report themselves. Most often the Owner will choose the former. Whatever procedure results from that discussion with the Owner should be confirmed in writing. Turner should proceed to distribute the report consistent with the Owner's guidance. Of course, if the contract already addresses this question, the contract should be followed. Any such correspondence to a Trade Contractor should clearly state that it is being sent on the Owner's behalf.

   When the Safety Director or staff member generates a report following a walkthrough under paragraphs 1 or 2 above, the following formats shall be utilized to communicate the report to the Owner and/or Trade Contractors, as may be applicable, follow:

To: Owner
From: Turner Rep
Re: (Project Name), Safety Walkthrough, (Date)

Turner recently conducted a walkthrough of the project for the limited purpose of assessing the conditions at the project site as they affect the safety of the Turner personnel assigned to this project. Since Turner's role in connection with this project does not include project safety oversight, obligations, management or reporting, our walkthrough was focused only on the safety of the assigned Turner personnel. This report presents Turner's findings in that limited context. Turner has not attempted to report on, assess or review the safety of the operations of the various trade contractors beyond this limited context, although this report may include any such issues that were noted. We bring this report to your attention to assure that the Turner personnel are not exposed to danger because of any unsafe operation or condition.

We noted certain safety related issues that warrant attention. Enclosed you will find a copy of that report.

Two options based on whatever agreement was reached with the Owner regarding who will distribute the report to the contractors, either - Per our discussion, we understand that you will forward this report to the relevant contractors and demand that corrective action be taken immediately. ***Or*** - Per our discussion, we will forward a copy of this report to the relevant contractors and convey your demand that corrective action be taken immediately.

We strongly urge that corrective action proceed at once. Please note that Turner's role on this project does not extend to safety related issues or assessments, and recognize the limited purpose of the walkthrough that is described at the beginning of the report. As stated, we assume that you would be interested in the contents of this report and that you will agree that it makes sense to address the issues reported. Our sharing this report with you should not be misinterpreted as Turner accepting or assuming your responsibilities or obligations with respect to safety related matters.

To: Contractor
From: Turner Rep
Re: (Project Name), Safety Walkthrough, (Date)

Turner recently conducted a walkthrough of the project for the limited purpose of assessing the conditions at the project site as they affect the safety of the Turner personnel assigned to this project. Since Turner's role in connection with this project does not include project safety oversight, obligations, management or reporting, our walkthrough was focused only on the safety of the assigned Turner personnel. This report presents Turner's findings in that limited context. Turner has not attempted to report on, assess or review the safety of the operations of the various trade contractors beyond this limited context, although this report may include any such issues that were noted. We bring this report to your attention to assure that the Turner personnel are not exposed to danger because of any unsafe operation or condition.

We are providing a copy of this report to you at the request of the Owner, and the Owner has advised us to demand, on their behalf, that these safety issues be addressed immediately.

We strongly urge that corrective action proceed at once. Please note that Turner's role on this project does not extend to safety related issues or assessments, and recognize the limited purpose of the walkthrough that is described at the beginning of the report. As stated, we assume that you would be interested in the contents of this report and that you will agree that it makes sense to address the issues reported. Our sharing this report with you should not be misinterpreted as Turner accepting or assuming your responsibilities or obligations with respect to safety related matters.

4. Imminent danger situation

   If during the course of a walkthrough, the Safety Director or a staff member notices an imminent danger, immediate notification to the Owner and management of the Trade Contractor shall be made in order to correct the situation. The walkthrough report shall document that this has taken place. Imminent danger is where there is an obvious and observable condition that will likely cause great bodily harm/death and/or significant property damage.

5. Turner staff shall follow Turner safety and health rules in the course of the project with respect to the performance of their obligations.

Turner

Section 3

TURNER RISK MANAGEMENT CORPORATE ENVIRONMENTAL, HEALTH AND SAFETY POLICY

Engineering & Technology

Concrete and Masonry

I. Policy Statement

Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart Q – Concrete and Masonry Construction, in addition to the following guidelines.

II. Procedures

1. General Requirements

    a) Unless otherwise stated in their contract, the concrete or masonry contractor must provide at least two covered entrances into each building or structure during perimeter work. They must also cordon off other means of access/egress.

    b) No load may be placed on a concrete structure unless a qualified person, knowledgeable in structural design, determines that the structure is capable of supporting the load.

    c) Protruding reinforced steel, onto which employees could fall, must be protected to eliminate the hazard of impalement. The use of mushroom caps is not permitted for impalement hazards.

    d) Subcontractors must submit a formal Fall Prevention Plan to Turner, including the name and qualifications of their designated competent person.

    e) No worker, except those involved in post tensioning operations, shall be permitted to be behind the jack during tensioning operations. Signs and barricades shall be erected to limit access to the area.

    f) No worker shall be permitted to walk under concrete buckets while it is being elevated or lowered into position.

    g) No worker shall be permitted to apply cement, sand and water mixture through a pneumatic hose unless the employee is wearing the proper PPE including face protection.

    h) This subcontractor shall provide an eye wash station within 75 feet of any concrete or masonry work.

2. Equipment and Tool Requirements

    a) Powered and rotating concrete troweling machines must have a–switch that automatically shuts off power whenever the hands of the operator are removed from the machine.

    b) Masonry saws must be provided with a semi-circular guard (180 degrees of protection).

c) Machines must be locked and tagged out of service, per Section K, before employees can perform any maintenance or repair work.

3. Cast-In-Place Concrete Requirements

a) Formwork must be designed, fabricated, erected, supported, braced and maintained so it is capable of supporting all lateral and vertical loads anticipated to be applied to it.

b) All shoring equipment must be inspected prior to erection to determine if it meets the requirements specified in the formwork drawings.

c) Erected shoring equipment must be inspected immediately prior to, during and after concrete placement.

d) A qualified designer must prepare the design of the shoring and an engineer qualified in structural design must inspect the erected shoring.

e) Forms and shores must not be removed until the employer determines that the concrete has gained sufficient strength.

f) 100% fall prevention/protection must be maintained anytime a worker is exposed to falls greater than 6'.

g) At building perimeters where the decking steps down to allow for a beam pour, the height of the rails shall be increased accordingly.

h) Areas where form stripping is to be performed must be properly barricaded with tape or fence and signage must be posted on all sides. This should include areas below stripping.

i) Protruding nails should be removed or bent immediately.

j) Where employees must walk across rebar, temporary walkways must be installed to prevent trip hazards.

k) Outrigger platforms used for material movement in and out of the building via a crane or forklift must be designed by an engineer and incorporate 100% fall protection systems.

4. Masonry Requirements

a) A limited access zone must be established prior to the start of any masonry work.

b) The zone must be equal to the height of the wall, plus four feet for the entire length of the wall.

c) All masonry walls over 8 feet in height shall be adequately braced and remain in place until the permanent supporting elements of the structure are in place.

d) Employees that are working at heights greater than 6 feet must be protected from falling by guardrail systems, safety net systems or personal fall arrest systems.

e) For overhand bricklaying from a scaffold, fall protection is required if the working side of the scaffold has a gap greater than 12" between the scaffold and structure.

f) The specific fall prevention/protection method shall be documented in the JHA/PTP.

Confined Space Entry Policy

I. Policy Statement

No Turner Construction Company (Turner) or Subcontractor employee shall enter into any type of confined space, until the atmosphere of the space has been tested by a competent person and all applicable safety requirements contained in this procedure have been met. At a minimum 29 CFR 1910.146 and this policy will be followed when conducting confined space operations. Deviations from this policy must be approved by the BUSD and the BU Operations Manager

II. Procedures

1. Pre-Entry Assessment – Prior to any employee entering a confined space a competent person shall evaluate the area in order to determine if it is a "Non-Permit" or a "Permit Required" space. Depending upon the type of confined space identified, specific criteria must be satisfied before entry.

2. Signage - If the workplace contains permit spaces, the entry supervisor shall inform employees by posting danger signs at all entrances of confined spaces. The signs will be legible in English and in the predominant language of non-English reading workers. At a minimum, the following information will be included:

DANGER

PERMIT-REQUIRED CONFINED SPACE

DO NOT ENTER

3. Authorized Entry - If permit spaces exist in the workplace, only authorized employees may enter the spaces. The Entry Supervisor shall take effective measures to prevent unauthorized employees from entering into permit spaces.

4. Modification of Non-Permit Spaces - If non-permit spaces are modified, or experience any change that causes an increased hazard to entrants, the supervisor of the exposed employees, shall ensure that the space is reevaluated by the competent person.

5. Permit Required Spaces – If permit spaces are identified, the following program elements must be addressed in a **Written Project Specific Confined Space Procedure**. This procedure must be approved in advance by the **Business Unit Safety Director**:

    a) Environmental Controls – to ensure that pre-entry precautions (i.e. hazard evaluations, operating procedures, isolation methods, safety equipment, etc.) have been implemented.

    b) Atmospheric Testing – for oxygen content, explosive vapors, toxic substances and carbon monoxide to ensure that acceptable entry conditions exist. Confined spaces will be continuously monitored while entrants are in the confined work space.

    c) Assigned Duties – of each participant must be established and clearly communicated.

d) Rescue Equipment and Emergency Services – Develop and implement procedures for summoning rescue and emergency services, for rescuing entrants from permit spaces, for providing necessary emergency services to rescued employees and for preventing unauthorized personnel from attempting a rescue.– "Lifelines." Where an entrant must enter a confined space through a manhole or other small opening, means shall be provided for quickly removing them in case of emergency. When safety harnesses and lifelines are used for this purpose they shall be so attached to the entrant's body that their body cannot be jammed in a small exit opening. An attendant with a pre-planned rescue procedure shall be stationed outside to observe (if possible) and/or communicate with the entrant at all times and be capable of putting rescue operations into effect. At a minimum 29 CFR 1910.146 App F Rescue Team and Rescue Service Evaluation Criteria must be utilized when assessing rescue operations.

e) Entry Permit used to record critical data and serve as official entry authorization to enter the permit required space and must be implemented prior to entering the space. Upon completion of permit space work all documentation will be saved and reviewed by the Project Superintendent and Project Safety Manager (if assigned) for any lessons learned prior to filing.

f) Training – of employees expected to enter permit spaces must be provided and reviewed by the Project Superintendent and Project Safety Manager (if assigned) to ensure that they understand their duties and the requirements of 29 CFR 1910.146.

g) Medical Surveillance Program – May be required for certain types of confined spaces. The employer will consult with medical personnel to determine their employee's qualifications/requirements prior to entering confined spaces.
A sample written Project Specific Confined Space Procedure can be found in Appendix D of this manual.

Cranes, Derricks, Hoists, Elevators and Conveyors

I. Policy Statement

Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart N, Subpart CC – Cranes, Derricks, Hoists, Elevators and Conveyors, in addition to the following guidelines.

II. Procedures

1) General Requirements

a) No crane or hoist shall be placed in service on a Turner project until an annual, third party inspection and supplemental reports are submitted to Turner indicating that the crane or hoist meets the manufacturer's inspection criteria.

b) A daily crane inspection, performed by the competent person, is to be documented and those are reports are to be given to Turner when requested.

c) Any crane that is altered, "jumped", or modified in a similar manner onsite must be re-inspected by an independent third party inspection company to ensure proper calibration and function.

d) If the manufacturer's inspection criterion does not exist, a structural engineer, familiar with crane or hoist's design and dynamics, may develop or use existing inspection criteria.

e) Turner requires that all crane operators be certified by an independent testing agency approved by the National Commission for the Certification of Crane Operators. (NCCO). Copies of their certifications must be submitted to Turner. In addition, verification of hour's operation the specific type of crane must be submitted to TCCO supervision prior to operation.

f) Any lift exceeding 75% of the cranes rated capacity or lifts involving two or more cranes shall be considered a critical lift. A critical lift plan must be submitted to TCCO supervision for review prior to the lift. A sample plan and checklist has been linked to this document.

g) A pre-planning meeting to discuss the critical lift will held in the field with the crew to discuss, at a minimum, the following: calculation of gross weight load, load chart calculations, radius measurements anticipated during the lift, weather and soil conditions and overhead high voltage power line clearances. Calculations for the lift are to be reviewed during this meeting.

h) Mobile crane movement on site must be in accordance with manufacturer's recommendations.

i) At 20 mph, crane operations need to be evaluated by the competent person regarding the safe operation of the crane & the task associated with the crane. The crane shall not operate outside its wind limitations as stated in the operator's manual.

j) The swing radius of cranes must be properly barricaded at all times while working on site. Tape is not an acceptable barrier.

k) Outrigger pads should be at least 3 times the dimensions of the crane floats. The outrigger pads are to be pre-manufactured. The weight must be determined prior to lifting the load.

l) Wire rope, its attachments, fittings, sheaves and safety devices must be inspected according to the manufacturer's recommendations. Copies of the inspections must be submitted to Turner.

m) Wedge sockets and fittings must be the proper size to match the wire rope and must move to hold the wire rope under load. The dead end must be terminated according to ANSI B30.5 and must not be attached, in any manner, to the live side of the load line.

n) An anti two-block or warning device is required on all cranes as specified in ANSI B30.5 for each load hoisting line. This requirement may be waived by the BUSD for certain cycle duty crane operations such as pile driving and drilling rigs.

o) A qualified rigger (by a national recognized organization) must inspect the rigging prior to each shift.

p) All windows in cabs must be safety glass that produces no visible distortion that will interfere with the safe operation of the machine.

q) Cranes, hoists, boom trucks and derricks shall not be installed or operated within 20' of a power line unless they follow 1926.1408 (a) (2).

r) Assembly/disassembly must be directed by a person who meets the criteria for both a competent person and a qualified person, or by a competent person who is assisted by one or more qualified persons ("A/D director"). See 1926.1404

s) Before commencing assembly/disassembly operations, the A/D director must ensure that the crew members understand all of the following

1. Their tasks,
2. The hazards associated with their tasks.
3. The hazardous positions/locations that they need to avoid.

2) Crane Suspended Personnel Platforms
   a) The use of a crane suspended personnel platform is prohibited on Turner projects unless the employer can demonstrate that conventional methods to do the work are more hazardous. The BUSD shall be notified of each request.

   b) Specific crane operational criteria, listed in 29 CFR 1926, Subpart N, must be followed if it is determined that a suspended personnel platform will be used. The criteria includes, but is not limited to, the following:
   - Crane configuration requirements and inspections,
   - Additional crane instrumentation and/or components,
   - Specific platform design, construction and loading requirements,
   - Specific rigging and trial lift guidelines.

3) Material and Personnel Hoists
   a) Material Hoists
   - All entrances to hoists must be protected by substantial gates or bars, which guard the full width of the landing entrance.
   - Operating rules must be posted at the operator's station along with the notice "No Riders Allowed".

   b) Personnel Hoists
   - Hoist way doors or gates shall be at least 6'6" high and shall have a mechanical lock, which cannot be operated from the landing side.
   - All entrances to hoists must be protected by substantial gates or bars, which guard the full width of the landing entrance.
   - Hoists shall be inspected on a weekly basis. Hoists shall also be inspected after exposure to winds exceeding 35mph.
   - All hoists shall be inspected and tested at not more than three-month intervals.
   - All hoists shall have a "No Smoking" sign posted in the car and a fully charge fire extinguisher available for use

4) Controlling Contractor
   a. Ensure that ground preparations necessary to meet the requirements. The equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met. The requirement for the ground to be drained does not apply to marshes/wetlands. "Ground conditions" means the ability of the ground to support the equipment (including slope, compaction, and firmness).

   b. Inform the user of the equipment and the operator of the location of hazards beneath the equipment set-up area (such as voids, tanks, utilities) if those hazards are identified in documents (such as site drawings, as-built drawings, and soil analyses) that are in the possession of the controlling entity (whether at the site or off-site) or the hazards are otherwise known to that controlling entity.

   c. If the A/D director or the operator determines that ground conditions do not meet the requirements in paragraph (a) of this section, that person's employer must have a

discussion with the controlling entity regarding the ground preparations that are needed so that, with the use of suitable supporting materials/devices (if necessary), the requirements in paragraph (a) of this section can be met.

5) Signal Person Qualifications
   a. Know and understand the type of signals used. If hand signals are used, the signal person must know and understand the Standard Method for hand signals.

   b. The employer must make the documentation for whichever option is used available (Third party qualified evaluator or Employer's qualified evaluator) at the site while the signal person is employed by the employer. The documentation must specify each type of signaling (*e.g*. hand signals, radio signals, *etc.*) for which the signal person meets the requirements

   c. Please refer to 1926.1428 for reference.

Crane Critical Lift Plan

1. **This plan is to be followed if any of the following apply (check where applicable):**
   A. Load capacity is equal to, or exceeds 75% of load chart rating _____
   B. 2 or more cranes will be used during lift _____
   C. Any unusual circumstances _____Specify _____

2. **Crane description:** _____

3. **Load Description:** _____
   _____
   _____
   _____

4. **Load Weight:** _____
   Specify how the weight was determined and by whom:_____
   _____
   _____
   _____

5. **Description and weight of rigging and attachments:**
   A. Weight:_____
   B. Description: _____
   _____
   _____
   _____
   C. Weight determined by whom and how:_____
   _____
   _____
   _____

6. **Total weight of Load/Rigging/Attachments/Load Chart Deductions:** _____
   _____
   _____
   _____

7. **Equipment:**
   A. Maximum operating radius:_____
   B. Planned operating radius: _____
   C. Allowable load from crane load chart:_____
   D. Ratio of lift to allowable load (actual total load from line 5 divided by allowable load from chart): _____

8. Clearance:

A Clearance between boom and lift: _____

B Clearance to surrounding objects: _____

C Clearance for load movement sufficient: _____

9. Stability of Ground:

A Is the ground compact & stable:_____

B Are mats required:_____

C. Outriggers in place and blocking used: _____

D. Verify that the weight of the crane and units to be lifted are structurally supported by the public way:_____

10. Is a lift drawing required for this lift (if so, attach):_____

11. What type of communication will be used by operator and signal man: _____

_____

_____

12. What are wind and weather conditions:_____

_____

_____

A If wind speed is over 25 mph, do not proceed with the lift:_____

B. If wind speed is over 20 mph, consider postponing: _____

13. How will area be kept clear of pedestrian traffic:_____

_____

_____

14. Comments: _____

_____

_____

Lift Approval:

Signature:	**Date:**
A. Crane Operator: _____	_____
B. Crane Inspector:_____	_____
C. Rigging Supervisor:_____	_____
D. Lift Supervisor:_____	_____
E. Signal Man: _____	_____
F. Project Superintendent: _____	_____

Critical Lift Checklist

Project Name: _____

Address: _____

_____

Project No.: _____

Planning Data:

A. Trade Contractor: _____

1. Superintendent: _____
2. Lift Supervisor: _____
3. Crane Operator: _____

B. Description of Item to be lifted: _____

_____

C. Major hoisting Equipment to be used:

1. Make and model of crane: _____
2. Serial Number: _____
3. Length of Boom: _____

B. Equipment and Lift relationship:

1. Operating Radius: _____
2. Boom length: _____
3. Allowable Load (from load chart): _____
4. Ratio of Lift to allowable load: _____
5. Clearance between Boom and Lift: _____
6. Clearance to surrounding facilities: _____

C. Schedule of Operations (include time for rigging and equipment inspection): _____

D. Basis for Critical Lift:

1. Load exceeds 75% of Load Chart for Crane or Derrick: _____
2. Load exceeds 50% of Load Chart and failure would endanger existing facilities: _____
3. Two Cranes are required: _____
4. Other: _____

E. How weight of Critical Lift was obtained:

1. Certified Scale Weight: _____
2. Calculated independently by more than one source:

   a. Source: _____ Weight: _____

   b. Source: _____ Weight: _____
3. If lift is an existing item (being removed or demolished), the weight is to be recalculated, taking into account all modifications including internal as well as an allowance for scale, sediment, sludge, insulation, liquid, etc.

a. Source: _____ Weight: _____

b. Source: _____ Weight: _____

Date: _____ **Signature** (Lift Supervisor): _____

Demolition

I. Policy Statement

Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart T – Demolition, in addition to the following guidelines.

Prior to mobilizing, all projects must obtain a hazardous materials pre-demolition survey from the owner. This Survey must be prepared by a qualified third party environmental firm and shall identify all hazardous materials associated with the affected area.

II. Procedures

1. Preparatory Operations
    a) Prior to initiating demolition activities, an engineering survey of the building must be made by a competent person to determine the condition of the structure and identify areas subject to unplanned collapse. A copy of this inspection must remain on site.

    b) In select demolition, if the utilities cannot be capped, shut off or locked out, a system must be in place to identify what utilities are active or de-energized. All utilities must be shut off, capped or locked out of service beyond the building line before demolition work is initiated. A Hazard Assessment must be performed prior to the start of work to identify any hazardous chemicals, gases, explosives, flammable materials or similarly dangerous substances that may have been used on the property.

    c) Where employees are exposed to fall hazards, guardrail and personal fall arrest systems must be used. Hole covers must be identified and secured against accidental displacement.

    d) Any openings cut in a floor for the disposal of materials can be no larger than 25% of the aggregate of the total floor area, unless the lateral supports of the removed flooring remain in place.

    e) Employee entrances to multi-story structures being demolished shall be completely protected by installing a canopy or sidewalk shed that is at least 8 feet out from the building with the walkway at least 2 feet wider than the building entrance/exit.

    f) Turner must ensure that the subcontractor has verified that all local ordinances and permitting issues have been addressed as they relate to demolition.

2. Stairs, Passageways and Ladders
    a) Access to a structure being demolished will be restricted to designated stairways, passageways and ladders. Other access points will be closed at all times.

    b) All designated access points will be periodically inspected and maintained in a clean, safe condition.

3. Chutes
    a) No material may be dropped to a point outside the building unless a protective barricade is established. The material being dropped cannot be deflected or bounced any closer than 20' to the protective barricade.

    b) All chutes must be entirely enclosed except for openings at or slightly above the floor level for the insertion of materials.

    c) A substantial gate must be installed in each chute at or near the discharge end. A competent person must be assigned to control the operation of the gate and the backing and loading of trucks.

    d) Chutes must be designed and constructed of such strength as to eliminate failure due to the impact of material and debris loaded into them.

    e) When machinery will be near a chute opening, floor bumpers 4 inches thick & 6 inches wide are to be utilized, to prevent equipment from getting too close to the edge.

4. Removal of Walls, Floors & Steel
    a) Masonry walls, including sections of walls, will not be permitted to fall onto the floor of the building under demolition unless an engineer has determined that the floor can withstand the imposed load.

    b) No wall section, more than one story in height, will be permitted to stand alone without lateral bracing unless it was designed to stand alone.

    c) Structural or load-supporting members of any floor will not be cut or removed until all stories above such a floor have been demolished or removed.

5. Removal of Walls, Floors and Material with Equipment
    a) Mechanical equipment will not be used on floors unless the floors are of sufficient strength to safely support the equipment.

    b) Mechanical equipment will only be used for its intended purpose according to the manufacturer's recommendations.

6. Removal of Steel Construction
    a) Steel construction will be dismantled column length by column length, tier by tier.

    b) When floors have been removed, planking 10" wide by 2" thick must be used by employees engaged in razing the steel framing.

7. Mechanical Demolition
    a) No employees will be permitted in an area where "ball" or "clam" work is being performed. Only employees necessary for the performance of the operation may be permitted in this area.

    b) The area must be identified with warning barricades and signs.

c) During this operation continuous observations, by the competent person, must be made to identifying potential areas of failure.

8. Storage
   a) Storage of material or debris on any floor shall not exceed the allowable floor loads.

Electrical Hazards Prevention

I. Policy Statement

Use of electricity on the jobsite poses serious hazards, with employees potentially becoming exposed to such dangers as electric shock, electrocution, fires and explosions. All Turner employees and subcontractors working on a Turner project will comply with NFPA 70E Electrical Safety Practices and 29 CFR 1926, Construction Industry Regulations, Subpart K – Electrical in addition to the following guidelines.

II. Procedures

1. Working On or Near Exposed Energized Parts
    a) It is Turner policy that no one works on live electrical circuits. If a situation arises where it is impossible to perform a task with the circuit de-energized, the Turner Superintendent or Safety Manager shall contact the Business Unit Safety Director prior to performing the work. A formal pre-construction meeting shall occur prior to any such work occurring. All Hot electrical work shall comply with NFPA 70E Requirements.

    b) Only qualified persons may work on electric circuit parts that have not been de-energized under the procedures of 1910.333.

    c) Such persons must be capable of working safely on energized circuits and shall be familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials and insulated tools.

    d) All work must be completed with strict compliance to NFPA 70-E requirements and guidelines.

    e) The sub-contractor shall provide proof of training for their workers when requested by Turner Construction.

    f) Light switches and receptacles must be protected by permanent or temporary cover plates prior to energizing the circuit.

    g) All boxes containing energized circuits must have a cover in place, regardless of height.

    h) All electrical panels (temporary or permanent) must be locked at all times.

    i) Electrical room doors shall be secured at the earliest possible date.

    j) All Turner field staff should consider carrying an AC sensor that indicates energized circuits or wires. They are to be trained in the safe operation prior to its use.

2. Ground Fault Circuit Interrupters
    a) All 120-volt, single-phase 15 and 20 ampere receptacle outlets which are not part of the permanent wiring of the structure and which are in use by employees shall have approved GFCI's.

b) Turner requires that all projects are 100% GFCI compliant.

3. Electric Tools
    a) All portable electric tools such as saws, hammers, drills, vibrators and float machines must bear the label of a Certified Testing Agency, such as Underwriters Laboratories, CSA, ETL, or the like.

4. Extension Cords
    a) Only round, heavy-duty (type S, SJO, SJTW, ST, SO, STD), minimum 14 gauge cords are acceptable for use on site.

    b) Cords must be maintained in their original design configuration.

    c) Any cord which is damaged or has the grounding pin removed shall be removed from service.

    d) Plug ends can only be repaired by a qualified electrician.

    e) Whenever an extension cord is used for construction work, a GFCI is required between the extension cord and the receptacle.

    f) All electrical cords shall be elevated 8' in the air in hallways, corridors, aisles, stairways, doorways, and exit areas where a tripping hazard may occur.

    g) If the cords cannot be elevated, they shall be protected from damage by equipment, carts, trucks, and other rolling objects.

    h) Extension cords shall not be fastened with staples, hung from nails, or suspended with non-insulated wire.

5. Temporary Wiring
    a) All temporary wiring and lighting must meet current NEC codes. Flat cords (Romex) are not to be used as a flexible cord and are to be hardwired.

    b) Temporary lighting must never be put on the same circuit as temporary receptacles.

6. Temporary Lighting
    a) The minimum illumination level 5 foot-candles.

    b) Installation of temporary lighting must be per manufacturer's specifications and in compliance with OSHA, NFPA, NEC and local codes

Excavations

I. Policy Statement

The intent and purpose of this policy is to limit and/or eliminate the dangers associated with excavation and trenching operations that could expose workers to the possibility of serious injury or death. Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, and Subpart P – Excavations in addition to the following guidelines.

II. Procedures

1. Specific Excavation Requirements
    a) A comprehensive training program in the recognition, identification, evaluation and control of excavation hazards must be provided to all workers prior to working in an excavation or trenching operation. This must also include a review of the geo-technical report.

    b) Underground utility installations must be identified and marked prior to beginning any excavation. The Contractor's proposed method for identifying known utilities must be identified as required by Turner Construction's Ground Penetration Request Permit. The Project Superintendent will ensure that JHA's are completed and reviewed for all excavation activities for Turner, subcontractors and all their tiers.

    c) A competent person must be identified and their resume submitted to Turner prior to the start of work.

    d) The competent person will be on-site during all excavation work to determine the soil type and its stability by performing one visual and one manual test in accordance with 29 CFR 1926, Subpart P Appendix A.

    e) Inspections must be conducted daily and after every rainstorm or other hazard-increasing occurrence. Daily inspection reports must be submitted to Turner.

    f) All excavations, regardless of depth, shall be protected by safety fence or guardrails

    g) Any excavation greater than 4' in depth must have an access/egress ladder provided. The maximum travel distance to a ladder cannot exceed 25'.

    h) A Ground Penetration Request Permit must be utilized when a sub plans to dig deeper than 6 inches in depth.

2. Requirements for Protective Systems
    a) **Excavations greater than 4 feet in depth must be protected by one or more of the following systems**:

- Sloping / benching of sides to allowable configurations and slopes.
- Cannot bench C type soil.
- Using tabulated data.
- Utilizing a trench box or shield.
- Using a slope or shield system designed by a registered professional engineer. Refer to 29 CFR Subpart P, Appendix B.
    - Shield within 2 feet of the bottom of trench,
    - Employees are not permitted in the trench when the shield is moved,
    - Shield sticks up 18" above the top of slope.

b) Spoil piles must be kept back no less than two feet from the leading edge of an excavation.

c) A registered professional engineer must design sloping or benching systems for excavations greater than 20 feet in depth.

d) Persons walking or working adjacent to an excavation greater than 6 feet in depth must be protected from fall hazards in accordance with Turner's 100% Fall Protection Policy.

3. Training Requirements
    a) Each employee affected by the excavation and trenching systems must be trained in the procedures specific to the project, i.e. access / egress points, location of utilities, etc.

    b) Each affected employee must be trained in all sloping, benching, and shoring procedures prior to entering the excavation or trench.

    c) A competent person must be on-site throughout the excavation and/or trenching operation to determine soil type through visual and manual testing, hazard identification, effectiveness of sloping, benching, or shoring procedures, etc.

    d) Atmospheric monitoring, if deemed necessary by the Competent Person or other competent party, must be documented and conducted by someone trained in the use of atmospheric monitoring equipment.

GROUND PENETRATION REQUEST PERMIT

This request form must be completed and authorized prior to penetrating the ground greater than 6 inches anywhere on site. The contractor disturbing soil is required to contact the locater and review as-builts. J.H.A. **MUST** be submitted prior to commencing all ground-penetrating activities on site. And prior to the start of the work in the field, the supervisor will conduct a Pre-Task Planning meeting with the crew performing the work.

Date: _____

Contractor requesting excavation / surface penetration: _____

1. Name of Superintendent / Foreman _____ Phone_____

Anticipated Dates of Work: _____

Anticipated Hours of Work: _____

Remarks / Clarifications (as necessary) _____

Location of excavation or surface penetration: _____ (attach plan)
Description of Work: _____
_____

Means of disturbing soil *(check one):*

Excavator/Heavy Equip___ Backhoe ___ Pneumatic Driver (fence posts) ___ Drilling/Auger___
Motorized Saw___ Hand Removal (Shovel) ___ Other: _____

Contractor's Proposed Method of Identifying Known Utilities (Circle One)

1. Vacuum Excavating Yes No
2. Ground Penetrating Radar Yes No
3. Hand Excavation Yes No
4. Other Explain :_____
5. Were all known utilities identified? Yes No
   If no, which known utilities were not identified and why?
   _____
   _____

Layout of Proposed or New Work (Circle One)

1. Has the Contractor clearly identified the line of the proposed excavation Yes No

Utility Locate Organizations:

1. Identify organizations that have completed utility locates.
   _____ _____ (date / permit)
   _____ _____ (date / permit)
   _____ _____ (date / permit)

Approved Private Locator Company Name: _____
Method of Locating: _____

Identified Utilities:

GROUND PENETRATION REQUEST PERMIT

Have all known Utilities around the facility been physically located on the ground as applicable? Identify point of origin and point of termination of each line.

a.	Power	N/A		Yes		No	
b.	Control	N/A		Yes		No	
c.	Grounding		N/A		Yes		No
d.	Comm / Data	N/A		Yes		No	
e.	Water	N/A		Yes		No	
f.	Sewer	N/A		Yes		No	
g.	Gas		N/A		Yes		No
h.	Other	N/A		Yes		No	

Utility Delineation:
Has a ten foot utility channel "five feet on either side of the known utilities" been marked or delineated with snow fence, orange silt fence or the equivalent where the new work crosses the utility to ensure adequate recognition?
Yes No

As Built Reviewed? *(Circle One)* Yes No Date of Drawings/Docs: _____

Documented Safety Preplanning Meeting: Yes No

Are any overhead lines in the area? *(Circle one):* Yes No
If yes, they **MUST** be marked at ground level with signage.

Have the areas beneath the concrete slabs been X-rayed prior to any saw cutting or removal? (Circle One) Yes No

Competent Equip Oper. (*Print)*:_____ Foreman *(Print)*:_____

Spotter Required? *(Circle One)* Yes No
Are there existing utilities in the area described in this request? Yes_____ No _____

IF YES, the areas to be excavated are clearly marked-out and utilities within or near the proposed excavation will be "pot-holed" every 15 feet at a minimum using a vacuum process and protected through backfill operations. If multiple known existing utilities are within or near the proposed excavation, increased potholing will be required as determined on the JHA. Unknown existing utilities may be in the area of the work and excavation shall be done with due diligence, strict adherence to the Job Hazard Analysis (JHA), and awareness to prevent damage to unknown utilities.

CERTIFICATION:
By signing below, I understand that falsifying any part of this request will lead to my immediate dismissal from this project and that my employer will be responsible for any damages incurred as a result of my negligence. I certify that all records of existing utilities in the described area, including but not limited to As-Builts, Mark-Out and Underground Utility Coordination Reports have been examined and ALL KNOWN UTILITIES HAVE BEEN IDENTIFIED AND WILL BE PROTECTED FROM DAMAGE. Employees not aggressively identifying and protecting utilities will be removed from the project.

Subcontractor Superintendent/Foreman: _____
Turner Superintendent: _____

Fall Prevention

I. Policy Statement

Turner has a **Zero Tolerance Policy** in effect for violations of our 6' fall prevention policy. Anyone found violating this policy may be permanently removed from the project. Each contractor must submit to Turner the qualifications of their Competent Person trained in fall prevention techniques. Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart M - Fall Protection, in addition to the following guidelines.

II. Procedures

1) General Fall Prevention Requirements
    a. Each contractor, with employees exposed to a fall greater than 6', must submit their fall prevention plans to Turner prior to beginning work on site. The subcontractor and Turner staff will conduct a weekly inspection of their system.

    b. At no time shall a Safety Monitor system be used as a means of fall protection.

    c. A Personal Fall Arrest System (PFAS) comprised of a full body harness, 2 lanyards with double locking snap hooks, a guardrail and / or safety net system must be in place to protect all employees working above 6 feet.

    d. Covers for roof and floor openings must be secured against accidental displacement and identified as "Hole" or "Cover". Turner recommends that holes greater than 18"x 18" be protected by a guardrail system.

    e. Any floor opening 2" or larger must be protected.

    f. Employees must be protected from falling objects by the installation of toe boards, barricades, safety nets or canopy structures.

2) Fall Prevention Systems
    a. Guardrail Systems
        - The top rail height of a guardrail system must be 42", + or – 3". Midrail heights must be half of that distance. If stilts are used in the vicinity, the rail must be increased by the height of the stilts used.
        - Perimeter cable may be ½" wire rope, but in no situation may they be less than 3/8" steel cable.
        - The cable must be flagged at 6' intervals and must be terminated with three "Crosby clips" on each end & deflect no more than 3". The cable rail cannot deflect below 39".
        - The U-bolt clips must have the U-bolt section on the dead or short end of the rope and the saddle on the live or long end of the rope.
        - When using cables for perimeter guarding closed turnbuckles are to be used for every 3 bays or 100 feet, whichever is less.

- A Personal Fall Arrest System (PFAS) must not be attached to a guardrail system unless the system is designed by a Professional Engineer to accommodate the PFAS.
- Guardrail systems must be able to withstand a force of 200 lbs. in all directions, without failure, and be smooth surfaced to prevent hand injuries. The use of metal studs or similar is prohibited.
- The sub-contractor installing the perimeter cable guardrail system shall submit a design with details on how the system will be installed and maintained.

b. Safety Net Systems
   - Safety net systems must be installed as close as practical below the working deck, not to exceed a distance of 30'.
   - Safety net systems must be drop tested after initial installation and before being used as a fall prevention system.
   - Additional drop tests are required after any repair, whenever the nets are relocated and at 6-month intervals, if the nets are left in place.

c. Personal Fall Arrest Systems
   - A PFAS must be used when working from suspended scaffolds, articulating boom man lifts or when working above the protective system over floor openings and unprotected floor openings and unprotected perimeter edges.
   - A competent person must assure that fall distance calculations have been evaluated in each circumstance where a PFAS is used. The competent person must ensure that the intended uses of all PFAS assemblies are reviewed for each application on the project to ensure they are truly fit for the purpose which they are intended.
   - A PFAS is not required when climbing up or down a ladder. However, if employees are working from a ladder, fall protection is required.
   - Employees must use positive fall prevention devices when working in proximity to any leading edge work.
   - All leading edge construction requires the use of a Controlled Access Zone (CAS)
   - All anchorage points must be capable of supporting a load of no less than 5000 lbs. Engineered (PE Stamp) anchorage point and fall protection systems are also authorized.
   - Steel erectors and metal decking installers must utilize 100% fall prevention devices at all times when working over 6'.
   - Horizontal lifelines must be designed by an engineer and installed under the supervision of a qualified person. A safety factor of two must be maintained.
   - Turner does not allow the use of Safety Monitor Systems.
   - Adequate fall prevention devices must be used at all loading platforms prior to removing existing perimeter protection.

d. Warning Line Systems
   - If a warning line is utilized it must be 15 feet or more back from the edge.
   - If a worker is required to work or enter between the warning line & the edge, 100% fall protection is required.
   - The warning line height must be between 34" & 39" from the walking/working surface.

- The rope, wire or chain must have a breaking strength of 500 pounds and must be flagged every 6 feet.
- After erected, the stanchions must be secured from tipping due to wind, etc.

3) Training Requirements
   a. Each employee exposed to a fall hazard must be trained by a competent person in the recognition and avoidance of such a hazard. Proof of training shall be made available to Turner Construction upon request.

   b. Specific training includes, but is not limited to the following:
      - The type of fall exposures expected.
      - The correct procedures for erecting, maintaining, dismantling and inspecting of any fall prevention system used by the employee.

Fire Protection and Prevention

I. Policy Statement

Each subcontractor working on a Turner project must comply with 29 CFR 1926, Construction Industry Regulations, Subpart F – Fire Protection and Prevention, in addition to the following guidelines.

II. Procedures

1. General Requirements
    a) A site-specific fire prevention program shall be developed at each Turner project.

    b) Client requirements permit procedures, fire watches, shields and blankets must be considered when developing site-specific fire prevention programs.

    c) All firefighting equipment must be clearly visible and access to the equipment must be maintained at all times.

    d) A 20 lb. ABC dry chemical fire extinguisher or equivalent must be provided for each 3,000 square feet of protected building area. It is required that an extinguisher be placed at every stairwell on each level.

    e) Travel distance to a fire extinguisher must not exceed 100 feet.

    f) Portable fire extinguishers must be inspected monthly. The documentation must be a weather resistant tag attached to the extinguisher. In addition, the fire extinguisher must have the pin secured by a safety pull tab to be considered serviceable.

    g) Every fire extinguisher must have an annual inspection by a third party.

2. Fire Prevention
    a) Temporary offices or trailers, when located inside of a building under construction, must be constructed of fire retardant materials.

    b) Combustible materials, such as cardboard, wooden pallets, etc., must be removed from the work area as it is created.

3. Flammable and Combustible Liquids
    a) Flammable and combustible liquids must be stored in approved metal safety cans. An approved safety can is a closed container, not more than 5 gallons, with a flash-arresting screen and a spring closing lid. Plastic cans are not permitted onsite.

    b) Indoor storage of flammable or combustible liquids in excess of 25 gallons must be in an approved cabinet.

    c) Onsite fuel tanks must be double walled, be protected from construction vehicle traffic & have a spill containment system capable of holding all contents of the tank in the event of a leak. Dirt berms & dikes are not permitted. Jersey barriers are

considered a best practice for protecting fuel storage containers or storage of other flammable or combustible materials.

d) At least one 20 lb. ABC dry chemical fire extinguisher must be located within 25' to 75' of an outdoor storage area.

4. Liquefied Petroleum Gas (LPG)
   a) LPG must never be stored inside buildings. LPG gas must not be used in any building unless authorized by Turner Construction.

   b) When damage to LPG systems from vehicular traffic is possible, precautions must be taken to eliminate the hazard.

5. Temporary Heating Devices
   a) Fresh air must be supplied in quantities sufficient to maintain the health and safety of all employees. If a competent person deems natural airflow inadequate, then mechanical ventilation must be provided.

   b) Heaters used in the vicinity of tarpaulins, canvas or similar coverings must be located at least 10' from the covering and be secured so as to prevent ignition due to wind.

   c) Open fires are not allowed on Turner projects.

   d) Solid fuel salamanders are not allowed in buildings or on scaffolds.

6. Housekeeping is the best defense against fires. Place all trash and debris in proper containers. Place oily and/or paint soaked rags in a covered metal container.

7. Nothing Hits the Ground
   a) Work station shall be mobile and include a fire stop directly behind all chop saws.

   b) All rubbish shall be disposed of as it is generated and be immediately placed in a mobile rubbish container provided by the subcontractor.

   c) Debris is not allowed to be consolidated on the floor.

Hand and Power Tools

I. Policy Statement

All Turner Employees and Subcontractors working on a Turner project must comply with 29 CFR 1926, Construction Industry Regulations, Subpart I – Tools – Hand and Power, in addition to the following guidelines.

II. Procedures

1. General Requirements
    a) All hand and power tools and similar equipment, whether furnished by the employer or the employee, shall be maintained in a safe condition, per the manufacturer's guidelines.

    b) If the tool is designed to accommodate a guard or handle bar, the guard or handle bar and must be in place while the tool is being used.

    c) Additional personal protective equipment (PPE), such as a face shield, goggles and/or hearing protection, may be required while operating a tool.

2. Electric Powered Tools
    a) All power tools must be double insulated or provided with a three wire, grounded connection.
    b) All cords are to be inspected prior to their use. Cords having the outer jacket damaged shall be removed from service or must be replaced or repaired per the manufacturer's instructions.

    c) Only a qualified electrician may replace a cord and/or cord end.

3. Pneumatic Power Tools
    a) Each connection on a pneumatic tool and air hose must be secured with a "whip-check" or similar device.

    b) All air hoses, with an inside diameter exceeding ½ inch, must have a flow reduction device at the supply source to reduce pressure in case of hose failure.

    c) Compressed air must not be used for cleaning unless the pressure is reduced to less than 30 p.s.i. and appropriate guarding and PPE are in place.

    d) The 30 p.s.i. requirement does not apply to "blowing down" concrete decks or forms; however a spring loaded "dead man" control must be attached to the blowpipe.

4. Fuel Powered Tools
    a) Fuel powered tools must be stopped and turned off while being refueled, serviced or maintained.

    b) Combustion powered tools/equipment must not be utilized inside structures unless an evaluation has been conducted to ensure fumes will not affect personnel. The subcontractor who is utilizing the equipment is responsible to test and monitor the

indoor air quality. Scrubbers and/or mufflers may be required as dictated by the testing.

5. Powder-Actuated Tools
    a) The manufacturer, or their representative, must train employees in the safe use of powder-actuated tools.

    b) The tool must be tested each day, according to manufacturer's recommendations, before loading to see that safety devices are in proper working condition.

    c) Tools must not be loaded until just prior to the intended firing time.

    d) Loaded tools must not be left unattended.

    e) All tools must be used with the correct shield, guard or attachment recommended by the manufacturer.

    f) No lead based cartridges are to be used.

    g) Cartridges are to be safeguarded at all times.

6. Abrasive Wheels and Tools
    a) The RPM rating on all grinding machine motors must not exceed the speed rating of the grinding wheel attachment.

    b) All abrasive wheels must be closely inspected by the competent person and ring tested before mounting to ensure they are free from cracks or defects.

7. Woodworking Tools
    a) All fixed, power driven woodworking tools must be equipped with a disconnect switch that can be locked out in the off position.

    b) All portable, power driven circular saws must be equipped with guards above and below the base plate or shoe.

    c) When the tool is withdrawn from the wood, the lower guard must automatically and instantly return to the covering position.

Lock Out / Tag Out Procedure

I.Policy Statement

The intent and purpose of this procedure is to limit and / or eliminate the danger of the unexpected release of stored or residual energy that could cause injury or death to the employee or to the general public. Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart K, Section 1926.417, "Locking and Tagging of Circuits", in addition to the following.

II.Procedures

1. Lock Out/Tag Out (LOTO) will not be considered for use until all other avenues of attaining a "zero-energy state" have been exhausted.

2. All subcontractors working with electrical systems are required to have a written Lock Out / Tag Out Procedure. A **Competent Person** shall be responsible to control all aspects of the Lock Out / Tag Out (LOTO) procedure. They will ensure coordination with the appropriate tradesmen.

3. If a system can be locked out through design or by other means, this will be the preferred method.

4. The lockout device shall be substantial enough to prevent removal.

5. The lock shall be a separately keyed lock for use only with the lockout system.

6. The lockout device must be tagged with the name of the employee and their company. There shall be one lock for each employee (including Turner) exposed to the system.

7. If working in a multi-shift environment, each employee shall remove their respective locks at the end of their shift, with Turner being the last lock removed.

8. Employees shall not leave their lock on past the end of their shift. The use of 100% LOTO must be maintained until the completion of the task. **Verification by all competent persons in charge of the LOTO shall be completed prior to re-energizing the system.**

9. If the energy isolation device cannot be locked out and a tag must be used, authorization from the Business Unit Safety Director (BUSD) is required prior to start of work.

10. Tag out devices, including their means of attachment, shall be substantial enough to prevent accidental removal.

11. The tag shall warn against energizing the tagged out system such as: Do Not Start, Do Not Open, Do Not Close, Do Not Energize, Do Not Operate, etc.

12. The name of each employee shall be displayed on the tag.

13. The competent person shall be responsible for untagging and activating the system after all exposed employees have removed their tags.

III. Training and Documentation

1. Each employee affected by the LOTO procedure shall be trained in the procedure. Records of training will be kept on site and be made available to Turner Construction upon request.

2. Each employer utilizing LOTO must establish a program and utilize procedures for affixing appropriate lockout or tagout devices to energy isolating devices, and to otherwise disable machines, piping or equipment to prevent unexpected release of stored or residual energy in order to prevent injury to employees.

3. Each employee shall be trained in the identification of the lockout / tagout device.

4. A log shall be maintained on site that identifies the following:

    - Date of usage,
    - Number of locks and tags used,
    - Contractors involved,
    - Time of LOTO initiation,
    - Time of LOTO removal,
    - Designated competent persons.

5. In the event a lock is left on the lockout device and all of the subcontractors have verified with Turner that the lock should be removed and the system is safe to energize, a Turner Senior Manager must be notified. After consultation between the BUSD and the Turner Senior Manager, the subcontractor owning the lock may remove it.

6. This process must be **DOCUMENTED** to show you have followed all the steps to keep the workforce safe and have used “all reasonable means” to contact the employee who was responsible for the lock.

7. In the event an employee is discovered tampering with or violating the LOTO procedure, the employee will be removed from the project.

A comprehensive sample Lockout / Tagout Safety Program is available in Appendix E of this manual.

Material Handling and Rigging

I. Policy Statement

Material handling and rigging incidents account for a large number of workers compensation claims annually. Each contractor working on a Turner project must comply with 29 CFR 1926, Construction Industry Regulations, Subpart H – Materials Handling, Storage, Use and Disposal, in addition to the following guidelines.

II. Procedures

1. General Material Storage
    a) Aisles and passageways must be kept clear at all times for the safe movement of material handling equipment and employees. Storage areas must be kept free of accumulating materials that contribute to hazards of tripping, fire & pest harborage.

    b) Do not store material within 6' of any hoist way or interior floor opening.

    c) Do not store material within 10' of an exterior wall which does not extend above the material.

    d) Subcontractors must ensure each employee is trained in proper lifting techniques. Employees shall not lift more than 50 pounds per person. Mechanical means should be used as much as possible.

2. Rigging
    a) General Requirements
        - A maximum of (3) three members (only beams and similar structural members) may be hoisted per lift. Materials other than structural steel members may not be multiple lift rigged and lifted.
        - Individuals who rig loads must be qualified. An employer may not permit an individual to rig loads to be a lifted by a crane unless the individual has received training and also has the experience appropriate to their level of work. All riggers must be documented as a competent person.
        - A qualified rigger must be onsite and engaged in all critical lifts.
        - Subcontractors must provide and maintain a current list of all qualified riggers to the Turner Project Staff.
        - A qualified rigger must inspect all rigging to be used prior to each shift. Routes for suspended loads must be pre-planned to ensure that no employee is required to work directly below a load, unless they are engaged in the connection of the steel.
        - Inspections must also be conducted during use and where additional service conditions warrant.
        - Defective or damaged slings must be removed from service immediately.
        - Taglines shall be utilized to minimize worker exposure to falling and swinging loads.

b) Lifting Chains
- Alloy steel lifting chains must have a permanently affixed, durable identification tag stating size, grade, rated capacity and sling manufacturer. Only Grade 8 or better is permitted.
- Job made shop hooks or links, makeshift fasteners formed from rebar or bolts or other such attachments are not allowed on Turner projects.
- Additional lifting chain inspection criteria is based upon the frequency of use, the severity of the service conditions, the nature of the lifts being made and the experience gained on the service life of slings used in similar circumstances. Such inspections shall in no event be at intervals greater than once every 12 months.
- Lifting chains must be inspected, prior to each use. A written record must be provided to Turner upon request.

c) Wire Rope Slings
- The manufacturer's safe working loads must be followed at all times. The capacity tags must be present.
- Wire rope must not be used if, in any length of eight diameters, the total number of visible broken wires exceeds 10% of the total number of wires.
- Wire rope must not be used if it shows signs of excessive wear, corrosion or defects.
- Slings must not be shortened with knots, bolts or other makeshift devices.
- Slings must be protected from sharp edges with padding, softeners or similar devices.
- Shock loading of a sling is prohibited and slings must not be pulled from under a load when the load is resting on the sling.

d) Synthetic Slings
- Each synthetic sling must be identified with the name of the manufacturer, rated capacities and type of material.
- Nylon and polyester slings must not be used in temperatures in excess of 180 degrees F.
- Synthetic slings must be immediately removed from service if any of the following conditions are present; acid or caustic burns, melting or charring of any of the sling surface, snag, puncture, tear or cut, broken or worn stitches or distorted fittings.

e) Shackles & Hooks
- Attachments, including, but not limited to hooks, rings, shackles, oblong links, pear-shaped links or other welded or mechanical links, must have a rated capacity at least equal to the lifting chain, nylon sling or wire rope.

Motor Vehicles, Mechanized Equipment and Marine Operations

I. Policy Statement

Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart O – Motor Vehicles, Mechanized Equipment, and Marine Operations in addition to the following guidelines.

II. General Procedures

1. All operations requiring the use of heavy equipment will require a pre-planning meeting to coordinate and prevent injuries to workers and the public.

2. All motor vehicles and material handling equipment, with an obstructed view to the rear, must have a reverse signal alarm audible above the surrounding noise.

3. A “spotter”, wearing an ANSI approved high visibility traffic vest, may be used in lieu of an alarm, but only if such devices are not routinely supplied on such a vehicle. Vehicle must never back “blind” on a Turner project.

4. Forklift operator training records must be submitted to Turner prior to site use. The forks cannot be used for free rigging (straps or slings over forks).

5. A seatbelt must be provided and used when operating equipment on a Turner project.

6. All windows must be in full working condition. Any equipment with broken glass of any size, including mirrors will be taken out of service.

7. Each employee working near or crossing a site where equipment is in use must wear High Visibility Clothing.

8. Equipment without a rollover protective structure (ROPS) or seatbelt is not allowed on any Turner project.

9. The use cell phones (talking/texting) shall not be used while operating machinery/equipment.

10. No one may work within 20’ of motorized equipment like an excavator, backhoe, loader etc. unless that persons presence is fundamental to the operation underway and the operator can observe the person at all times.

11. All vehicles in use shall be checked at the beginning of each shift to assure that the following parts, equipment, and accessories are in safe operating condition and free of apparent damage that could cause failure while in use: service brakes, including trailer brake connections; parking system (hand brake); emergency stopping system (brakes); tires; horn; steering mechanism; coupling devices; seat belts; operating controls; and safety devices. All defects shall be corrected before the vehicle is placed in service. These requirements also apply to equipment such as lights, reflectors, windshield wipers, defrosters, fire extinguishers, etc., where such equipment is necessary.

12. Cannot operate a machine/equipment within 20 feet of any overhead energized line, unless specifically outlined in the JHA/PTP and reviewed by the Turner Project Superintendent & Project Safety Manager if assigned.

13. Whenever visibility conditions warrant additional light, all vehicles, or combinations of vehicles, in use shall be equipped with at least two headlights and two taillights in operable condition.

III. Site Clearing

1. Workers engaged in site clearing shall be protected from hazards irritant and toxic plants (poison ivy, sumac, etc.)

2. Each worker is to be instructed in the first aid treatment available onsite in regards to irritant and toxic plants.

3. All equipment shall be equipped with roll over protection and shall have overhead protection.

4. The overhead protection on the canopy structure shall not be less than 1/8" steel plate or ¼" woven mesh with no openings greater than 1" or equivalent.

IV. Pile Driving

1. Overhead protection shall not obscure the vision of the operator. The protection shall be equivalent to 2" planking or other solid material of equivalent strength.

2. Stop blocks shall be provided for the leads to prevent the hammer from being raised against the head block.

3. A blocking device, capable of supporting the weight of the hammer, shall be provided for placement in the leads under the hammer at all times when workers are working under the hammer.

4. Guards shall be provided across the top of the head block to prevent the cable from jumping out of the sheaves.

5. When leads must be inclined in the driving of batter piles, provisions shall be made to stabilize the leads.

6. Safety chains or equivalent shall be provided for each hose connection to prevent the line from thrashing around in case the coupling becomes disconnected.

7. Engineers and winchmen shall accept signals only from the designated signal person.

8. All workers shall be kept clear when piling is being hoisted into the leads.

9. When piles are being driven in an excavated pit, the walls of the pit shall be sloped to the angle of repose (type C soil) or sheet piled and braced.

10. An Anti-two block device is not required when using leads in pile driving.

Industrial Vehicles

I. Introduction

The Company has determined that certain powered industrial vehicles are utilized at its projects and has developed this policy to establish the procedures that must be followed for the use of such vehicles at the Company's projects.

II. Purpose

Provide for proper equipment selection, inspection and operation of certain powered industrial vehicles, including but not limited to All Terrain Vehicles (ATV) or Quads, Three Wheeler, Four Wheeler, Gators, Mules, and all other similar vehicles. Only vehicles that have previously been approved by the Operations Manager and BU Safety Director for use at its projects may be utilized at the Company projects and must be in compliance with the policy. This policy also applies to vehicles owned and operated by Subcontractors and Subcontractor employees.

III. Insurance

All vehicles covered under this policy are to be scheduled to Turner's property plant and equipment (contractor's) policy. It is the responsibility of the jobsite accountants to properly report all equipment under this policy.

IV. Prohibited Vehicles

1. All vehicles with the following features (in combination) are prohibited from all Turner projects:

    1) Typically carry one rider;

    2) Have no rollover protection or seat belts; and

    3) Have a handlebar similar to a motorcycle for navigation

    These vehicles may be commonly referred to as All-Terrain Vehicles (ATV), Quads, Three Wheelers, or Four Wheelers (or other similar equipment). This prohibition includes vehicles owned by subcontractors as well.

2. All personal (owned by an individual) All-Terrain Vehicles (ATV's), Quads, Three Wheelers, Four Wheelers, Mules, Gators, or other similar equipment are prohibited on all Turner Projects.

V. Regulatory References

OSHA 29 CFR 1910.178, Powered Industrial Trucks, as applicable.

VI. Procedures

1. All powered industrial vehicles must be equipped as follows:

    a. Each vehicle must have a legible nameplates and markings that indicate its load limits;

    b. Any modifications and additions, which affect capacity and safe operation, must not be performed without manufacturer's prior written approval. Where modifications and additions are made, the capacity, operation, and maintenance instruction plates, tags or decals must be marked accordingly.

2. Where liquid fuels, such as gasoline, diesel fuel or LPG, are used for powered industrial vehicles the following precautions must be followed:

    a. Appropriate handling and storage safeguards followed;

    b. Fuel tanks must not be filled while the engine is running;

    c. Spillage from refilling fuel tanks must be avoided;

    d. Spillage or oil or fuel must be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine;

    e. No vehicle may be operated with a leak in the fuel system until the leak has been corrected;

    f. No smoking or open flame while refueling; and

    g. Appropriate PPE must be worn while refueling.

3. Where electric powered industrial vehicles are used, the following precautions must be followed:

    a. Battery charging installations must be located in areas designated for that purpose;

    b. Facilities must be provided for flushing and neutralizing spilled electrolyte;

    c. Facilities must be provided for fire protection;

    d. Facilities must be provided for protecting charging apparatus from damage by trucks;

    e. Facilities must be provided for adequate ventilation for dispersal of fumes from gassing batteries;

    f. Material handling equipment must be provided for handling batteries;

    g. Reinstalled batteries must be properly positioned and secured in all electric powered trucks;

    h. A carboy tilter or siphon must be provided for handling electrolyte;

    i. When batteries are charged, acid must be poured into water and water is not poured into acid;

    j. Appropriate PPE must be worn when adding acid;

    k. Vehicles must be properly positioned with the brakes applied before their batteries are changed or charged;

    l. When batteries are charging, their vent caps must be clear and functioning and the battery (or compartment) cover(s) must be left open to dissipate heat; and

    m. Precautions must be taken to prevent smoking and other sources of ignition out of the charging area.

4. Adequate lighting must be provided for all powered industrial vehicle operations.

5. Carbon monoxide concentrations as a result of powered industrial vehicle operations must not exceed the Permissible Exposure Limit of 50 ppm.

6. Powered industrial vehicle drivers must follow appropriate safe operating practices as contained in the manufacturer's manual. Non-authorized associates must never operate powered industrial trucks.

7. Powered industrial trucks must be inspected and repaired as follows:

   a. Drivers must conduct pre-operation and post-operation safety inspections at least at the start of each shift on which the vehicle is used;

   b. Any power-operated industrial vehicle not in safe operating condition must be removed from service;

   c. All repairs must be made by authorized personnel;

   d. Repairs must be made only in a location designated for such repairs;

   e. Vehicles in need of repairs to the electrical system must have the battery disconnected prior to such repairs;

   f. All replacement parts used on industrial vehicles must be equivalent to the safety features as used in the original design;

   g. Industrial vehicles must not be altered so that they have different configurations, extra parts or additional counterweighting, unless approved by the vehicle manufacturer;

   h. Any vehicle that emits hazardous sparks or flames from the exhaust system must be immediately removed from service, and not returned to service until the cause for the emission of such sparks, and flames has been eliminated;

   k. When the temperature of any part of any vehicle is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the vehicle must be removed from service and not returned to service until the cause for such overheating has been eliminated; and

   l. Industrial vehicles must be kept in a clean condition, free of lint, excess oil and grease.

VII. Training

1. All authorized drivers must complete training as follows:

   a. Manufacturer requirements (as coordinated through the dealership of the equipment) for the safe operation of the vehicle including use of personal protective equipment, authorized surfaces for operation of the vehicle, weight restrictions, and other operational conditions.

   b. OSHA 29 CFR 1910.178 Powered Industrial Trucks.

   c. This training shall be written formally into the Project Specific Safety Plan by the project team, approved by the BU Safety Director.

d. A documented sign-off for the authorized driver must be a part of the training manual provided with the training.

2. All non-authorized associates who work in areas where powered industrial vehicles are in operation will be instructed to never operate any powered industrial vehicle, and will be instructed in work practices for pedestrians working in those areas.

3. Retraining must be repeated at least every three years and as necessary to maintain the required driver skills and when:

   a. The operator has been observed to operate the vehicle in an unsafe manner;

   b. The operator has been involved in an accident or near-miss incident;

   c. The operator has received an evaluation that reveals that the operator is not operating the vehicle safely;

   d. The operator is assigned to drive a different type of vehicle; or

   e. A condition in the workplace changes in a manner that could affect safe operation of the vehicle.

Scaffolds

I. Policy Statement

Each Contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart L – Scaffolds, in addition to the following guidelines.

II. Procedures

1. General Requirements
    a) Capacity
        - Scaffolds must be erected under the supervision of a competent person. The name and qualifications of this person must be submitted to Turner prior to the start of work.
        - Scaffolds and their components must be able to support at least four times the maximum intended load.

    b) Platform Construction
        - Each working platform on a scaffold must be fully decked or planked.
        - Any gap in a working platform cannot exceed 1".
        - All planks or platforms must be cleated or overlap a minimum of 6", but no more than 12".
        - Wooden scaffold planks must not be painted.
        - Scaffold components from different manufacturers may be intermixed as **long as they fit together without force** and scaffold integrity is maintained.

    c) Supported Scaffolds
        - Supported scaffolds with a height to base width ratio exceeding 4:1 must be stabilized from tipping by a solid connection such as guy wires, bracing, tying or other equivalent means. Note: a 3:1 ratio may be required by State, Local or the Client
        - When scaffolds are erected adjacent to structures, they must be secured to the structure every 26' vertically and 30' horizontally.
        - Scaffold poles, legs, posts, frames and uprights must be placed on base plates, mudsills or other adequate firm foundations.

    d) Suspension Scaffolds
        - Each suspension rope, including connecting hardware, used on adjustable or non-adjustable suspension scaffolds shall be capable of supporting, without failure, at least 6 times the maximum intended load applied or transmitted to that rope with the scaffold operating at either the rated load of the hoist.
        - Counterweights must be made of non-flowable material. Sand, gravel, water or similar material may not be used.
        - Counterweights must be secured to the outrigger beams by mechanical means to prevent accidental displacement.
        - Outrigger beams that are not bolted to the structure must be secured by tiebacks. The tiebacks must be attached to a structural member of the building. Standpipes, vents, conduit and other piping systems are not adequate structural members.

- Tiebacks shall be equivalent in strength to the suspension ropes
- Direct connections to roofs and floors, and counterweights used to balance adjustable suspension scaffolds, shall be capable of resisting at least 4 times the tipping moment imposed by the scaffold operating at the rated load of the hoist.

e) Scaffold Access
- Cross bracing must never be used as a means of access.
- Stair rail and handrail systems must be smooth surfaced so as to prevent lacerations or puncture wounds.
- A competent person must evaluate safe means of access during erection and dismantlement of the scaffold. Proper access shall be provided to each worker that is working on/off a scaffold.

f) Scaffold Use
- Scaffolds and scaffold components must never be loaded in excess of their maximum intended loads.
- Scaffolds and scaffold components shall not be left loaded with material overnight, unless the materials are secured. Materials shall not be left on suspended scaffolds overnight unless the scaffold is grounded.
- A competent person must inspect each scaffold before every shift and after any occurrence that may affect its structural integrity.
- The competent person will “tag” the scaffold “in service” or “out of service” prior to employee use.
- Scaffolds cannot be erected, moved, dismantled or altered except under the supervision of a competent person.
- Snow, ice and other slippery conditions must be eliminated before employees are allowed access to a scaffold.

g) Fall Prevention
- A Personal Fall Arrest System (PFAS) or guardrail system must be in place on all scaffolds exceeding 6’ in height.
- Each employee on a single-point or two-point suspension scaffold must be protected by a PFAS and guardrail system, except boatswains’ chair which requires PFAS.
- The use of fall prevention devices are required during the erection or dismantling of a scaffold.
- When vertical lifelines are used, they must be protected from surface abrasion.
- Guardrails are required and must be 42”, + or – 3” in height. Mid-rails must be half the distance from the toprail height to the platform deck. Toe boards should be constructed from 2”x4” material or equivalent and must met existing state or client requirements.

h) Falling Object Protection
- The area below a working scaffold must be barricaded to protect employees from a falling object hazard.

2. Requirements for Specific Scaffold Types
   a) Tube and Coupler Scaffolds

- Tube and coupler scaffolds, in excess of 125', must be designed by a registered professional engineer (RPE).

b) Fabricated Frame Scaffolds
- Frames and panels must be braced by cross, horizontal or diagonal braces.
- Frames and panels must be joined together vertically by stacking pins or equivalent couplings.
- Frame scaffolds, in excess of 125", must be designed by an RPE.

c) Pump Jack Scaffolds
- Cannot be used on Turner projects unless approved by the BUSD.

d) Mobile Scaffolds
- Mobile scaffolds must be braced by cross, horizontal or diagonal braces based on manufacture's requirements to prevent racking during movement.
- Wheels must be locked when in use.
- Caster and wheel stems must be pinned to the scaffold legs or adjustment screws.
- The height to base width ratio on a mobile scaffold cannot exceed 2:1 unless it is braced with outrigger frames.
- Scaffolds that are less than 45" in width (Baker Type), a guardrail is required when working height is greater than 48" above the floor. If more than one section used on a baker scaffold, outriggers must be used.

3. Aerial Lifts

a) Prior to mobilizing, all Mobile Elevated Work Platforms (MEWP) must be inspected to ensure compliance with Turner requirements. MEWP's (scissor lifts, aerial boom lifts, and knuckle booms) must have dual action controls to be approved for use.

b) Dual action controls require that there be two separate actions to activate the lift. If a MEWP arrives on site and does not have dual action controls, then it must remain inoperable until a Dual action control is installed. The dual action control may consist of a button that must be depressed in order for the controls to operate, or a toggle switch that must be activated prior to operating the MEWP controls (The toggle switch must automatically return to the center when released).

c) The contractor is required to complete a daily inspection sheet for all powered lift trucks and mobile elevated work platforms. The inspection includes operational and physical parameters for operation of the equipment being inspected. The inspection form must be posted in a visible location during operations and a copy made available to Turner upon request. An inspection form is available from Turner.

d) Field modifications are not allowed on aerial lifts.

e) Only authorized and trained individuals may operate aerial lifts.

f) When a lift is delivered to the project, the rental company or the owner of the lift shall inspect the lift & provide documentation the lift is safe to operate onsite. The

lift shall be free from any physical defects in new or like new condition with all the safety placards present.

g) Employees must use personal fall arrest systems (PFAS) when working from articulating boom platforms.

h) When working from a scissor lift, the use of PFAS in conjunction with the guardrails is required.

i) Employees must keep both feet on the floor of the basket and not stand on the railing or toe board during operation.

j) If operating in congested areas, MEWP's will require spotters. The spotters will be responsible for ensuring that the area around the MEWP and the travel path are free of obstruction and clear of equipment and personnel.

k) Man baskets such as those utilized from fork truck type vehicles are not allowed on Turner projects.

4. Scaffold Training Requirements
   a) Each employee that works on a scaffold must be trained by a qualified person in the recognition and avoidance of hazards associated with the type of scaffold they will be required to work from.

   b) Each employee that is involved in the erection, dismantling, moving, operating, repairing, maintaining or inspecting of a scaffold must be trained by a qualified person in the recognition and avoidance of hazards associated with these operations.

MEWP CHECKLIST

Name/Type of MEWP:			**Contractor Name**					
Model or Equip No.:			**Contact Number**					
Operator or Inspectors Name: (person performing the inspections)								
	Date:	/	/	/	/	/	/	/
	Shift:							
	Is the operator trained to operate this MEWP and does the operator have a valid operator's license/card?	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Inspection Item & Description **Pass Fail Status**		**P/F**	**P/F**	**P/F**	**P/F**	**P/F**	**P/F**	**P/F**
1	Operating and emergency controls are in proper working condition, EMO button or Emergency Stop Device							
2	Upper drive controls interlock mechanism is functional (i.e. foot pedal, spring lock, or two hand controls;)							
3	Emergency Lowering function operates properly							
4	Lower operating controls successfully override the upper controls							
5	Both upper and lower controls are adequately protected from inadvertent operation.							
6	Control panel is clean & all buttons/switches are clearly visible (no paint over spray, etc.)							
7	All switch & mechanical guards are in good condition and							

	properly installed							
8	All Safety Indicator lights work							
9	Drive controls function properly & accurately labeled (up, down, right, left, forward, back)							
10	Motion alarms are functional							
11	Safety decals are in place and readable							
12	All guard rails are sound and in place, including basket chains							
13	Work platform & extension slides are clean, dry, & clear of debris							
14	Work platform extension slides in and out freely with safety locking pins in place to lock setting on models with extension platforms.							
15	Inspect for defects such as cracked welds ,fuel leaks, hydraulic leaks, damaged control cables or wire harness, etc.							
16	Tires and wheels are in good condition, with adequate air pressure if pneumatic							
17	Braking devices are operating properly							
18	The manufacturer's operations manual is stored on MEWP (in all languages of the operators)							

Signs, Signals and Barricades

I. Policy Statement

All employees of the Turner Construction Company and its subcontractors will comply with 29 CFR 1926, Construction Industry Regulations, Subpart G, Signs, Signals and Barricades, at a minimum, in addition to the following.

II. Procedures

1. Required signs will comply with the OSHA standards described in 1926.200.

2. Where areas may require additional awareness or present unique danger, the use of warning tape may be necessary.
   a) For areas that require additional caution, (e.g. uneven surfaces, wet surfaces) yellow "caution" tape should be used. Caution tape does not prohibit access.
   b) For areas where entry and travel are prohibited, (e.g. areas where fall protection is being erected or areas with overhead work being performed) red "do not enter" tape should be used. "Do not enter" tape is intended to prohibit access and should not be used in areas where physical barricades are required as a substitute for required physical barricades.
   c) The warning tape should have a sign with the nature of the hazard, the contractor who installed the tape with a contact number, and the duration the tape will be in place.
   d) The intent of the warning tapes is to notify of hazards that may arise during construction activities. Every effort should be made to correct these situations with permanent solutions in a timely fashion.

3. All flagmen shall be trained on appropriate procedures before controlling traffic, as required by the Manual on Uniform Traffic Control Devices (MUTCD) and any Municipal or State guidelines.

4. All flagmen shall utilize sign paddles and shall be outfitted with high visibility garments, as required by current ANSI standards. All PPE and traffic control equipment shall be outfitted with reflectorized material for night work as required by current ANSI standards.

5. All crane and hoist signals shall comply with applicable ANSI standards.

6. All traffic control devices shall comply with the MUTCD and any applicable Municipal or State guidelines.

7. Emergency communication signage / egress route signage should be posted on floors that includes the locations of exits, stairs, fire extinguishers, gates, etc.

Stairways and Ladders

I. Policy Statement

Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart X – Stairways and Ladders, in addition to the following guidelines.

II. Procedures

1. General Requirements
    a) A stairway or ladder must be provided at all personnel points of access where there is a break in elevation of 19" or more.

    b) Scaffold type stair towers or prefabricated stairs shall be utilized instead of job built ladders.
2. Stairways
    a) When doors from an office or storage trailer open directly onto a stairway, a platform must be provided and the swing of the door must allow an additional 20" to prevent the door from striking an employee.

    b) Employees are not allowed to use metal pan stairs unless they have been fitted with wooden filler blocks or poured with concrete.

    c) Stairways with four or more risers or rising more than 30", whichever is less, must have a stair rail or handrail along each unprotected side or edge.

    d) Handrails that will not be a permanent part of the structure being built shall have a minimum clearance of 3 inches between the handrail and walls, stair rail systems, and other objects. 2x4 blocks are acceptable for spacers.

    e) The stair rails are to free of nails & hazardous projections.

3. Ladders
    a) Turner has implemented a ladders last program on all Projects.

    b) Only fiberglass ladders are to be utilized. Metal and wood ladders will not be used on Turner projects.

    c) At a minimum, only Type IA Heavy Duty (300 lb. limit) ladders may be used on Turner projects.

    d) When employees ascend or descend a ladder, they must maintain a three-point contact and not carry anything that could cause them to lose their balance.

    e) Pull ropes should be placed at all access ladders so employees can safely lift tools or equipment to upper levels.
    f) Stepladders must be opened fully and set level when in use.

    g) When extension ladders are used to access upper landings, the side rails must extend at least 3 feet above the landing and secured at the top.

h) All ladders must be used for the purpose for which they were designed.

i) The base of an extension and or straight ladder is to be placed 1 foot horizontal from the face of the surface for every 4 feet vertical.

4. Training
   a) Each employee involved in stair and ladder use must be trained by a competent person in the recognition and avoidance of stair and ladder hazards.

III. Ladders Last Policy Statement

1. **Ladder use on Turner Construction projects will be allowed only when it has been determined that it is unfeasible to use all other options to complete the task.**

2. **If it is determined that a ladder is the only means of performing the job at elevated height, a ladder permit must be submitted prior to starting work. At no time will a ladder be on site without a current permit and safety checklist.**

3. **Use of job built ladders is prohibited on Turner Construction Projects. Temporary stair towers or prefabricated stairs shall be used to access different building levels.**

IV. Procedures for identifying and responding to all tasks that require the use of a device that allows work from height:

1. Prior to beginning work, the subcontractor or superintendent (for self-perform work) shall evaluate all tasks that require individuals to work at elevated heights. It is the expectation that these tasks will be performed using methods other than a ladder. Use of lifts and portable scaffold devices shall be the preferred method to perform this type of work.

2. If it is determined that a ladder must be used:

a. The subcontractor shall complete the Turner Construction Ladder Use Permit and have it reviewed and approved by the Turner Superintendent.

b. **Workers must maintain three points of contact at all times when working from a ladder. If this cannot be done, worker must tie off at any height.**

c. When working at a height greater than six (6) feet, 100% fall protection is required. A retractable is the only option in this case.

d. Prior to starting work each shift, The **Turner Construction Ladder Safety Inspection Checklist** shall be completed affixed to all ladders.

e. Platform ladders shall be the ladder of choice on Turner Construction projects.

f. **Prior to using a ladder, the Turner Superintendent will review and approve the Job Hazard Analysis, Pre Task Plan, and Ladder Use Permit.**

Steel Erection

I. Policy Statement

Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart R – Steel Erection, in addition to the following.

II. Procedures

1. General Site, Erection and Construction Sequence Requirements
    a) The controlling contractor must provide the steel erector written notification that the concrete or mortar in masonry walls has reached either 75% of the intended minimum strength or sufficient strength to support the anticipated loads during steel erection.

    b) The controlling contractor must ensure that site access roads and storage areas are adequate for the safe delivery and movement of cranes, trucks and other equipment necessary to erect steel. The equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met.

    c) A site-specific erection plan must be developed by a qualified person and submitted to Turner prior to the start of work.

    d) A site-specific fall prevention plan must be developed, submitted to Turner and administered by a competent person prior to the start of work. The plan must include Job Hazard Analysis' (JHA's) and Pre-Task Planning (PTP) meetings.

    e) The controlling contractor must ensure that state and municipal permitting issues are addressed when off-loading steel and /or materials on public roads.

2. Hoisting and Rigging
    a) Cranes being used in steel erection must be visually inspected by a competent person prior to each shift.

    b) Individuals who rig loads must be qualified. An employer may not permit an individual to rig loads to be a lifted by a crane unless the individual has received training and also has the experience appropriate to their level of work. All riggers must be documented as a competent person.

    c) Outrigger pads should be at least 3 times the dimension of the crane float. The outrigger pads are to be pre-manufactured.

    d) A qualified rigger must inspect all rigging to be used prior to each shift. The qualification of the qualified person must be submitted to Turner for review prior to the start of work.

e) Routes for suspended loads must be pre-planned to ensure that no employee is required to work directly below a load, unless they are engaged in the connection of the steel.

f) Multiple lift rigging may be performed when the following conditions are met:
- A multiple lift rigging assembly is used.
- A maximum of **(3) three members** are hoisted per lift.
- Only beams and similar structures are lifted.
- All employees engaged in the activity have been trained in the specific procedures identified in OSHA Subpart R, 1926.761.

g) See the Crane and Material Handling and Rigging section for additional information.

3. Structural Steel Assembly
   a) There should never be more than four floors or 48', whichever is less, of unfinished bolting or welding above the foundation or permanently secured floor. An exception would be if the structural integrity were maintained as a result of the design.

   b) A fully planked or decked floor or nets must be maintained within two stories or 30', whichever is less, directly below where erection work is being performed.

   c) Shear connectors, also known as "Nelson studs", must not be attached to the top of the beam until after the decking has been installed.

   d) Metal decking shall be laid tightly and immediately secured upon placement to prevent accidental movement or displacement.

   e) At the end of each shift, unbundled metal decking shall be secured in place.

4. Beams and Column Anchorage
   a) All columns must be anchored by a minimum of 4 anchor bolts.

   b) All columns must be evaluated by a competent person to determine whether guying or bracing is necessary.

   c) During the placing of structural beams, the load must not be released until a minimum of two bolts, per connection, are secured in place.

   d) Employees connecting horizontal members shall not use the members as an anchorage point unless they have been secured at two points independent of an active hoist line. (i.e. they shall not walk out onto a member that is only connected on one side and is still attached to the crane).

   e) Anchor bolts <u>shall not</u> be repaired, replaced or field modified without the approval of the project structural engineer of record.

   f) Prior to the erection of a column, the controlling contractor shall provide written notification to the steel erector if there has been any repair, replacement or modification of the anchor bolts of that column.

5. Personal Fall and Falling Object Prevention
    a) All material, equipment and tools must be secured against accidental displacement while aloft.

    b) Each employee engaged in a steel erection activity that is on a walking or working surface with an unprotected side or edge 6’ or more above a lower level, must be protected from fall hazards by safety net systems, guardrail systems or personal fall arrest systems. Turner Construction has a 100% Fall Protection ZERO TOLERANCE POLICY. AT NO TIME SHALL ANYONE BE AT A HEIGHT > 6’ WITH OUT BEING PROTECTED. This includes connectors and any employee installing metal decking.

6. Training
    a) All training must be provided by a qualified person, knowledgeable in the recognition and avoidance of hazards associated with steel erection.

    b) Training includes, but is not limited to; fall hazards, multiple lift rigging and steel connection.

Underground Construction, Caissons, Cofferdams and Compressed Air

I. Policy Statement

Each contractor working on a Turner project will comply with 29 CFR 1926, Construction Industry Regulations, Subpart S – Underground Construction, Caissons, Cofferdams and Compressed Air, in addition to the following guidelines.

II. Procedures

1. The employer must control access to all openings to prevent unauthorized entry underground. Unused chutes, man ways, or other openings must be tightly covered, bulk headed, or fenced off and must be posted with warning signs stating “Keep Out”, or similar in the appropriate languages.

2. The employer must assign and submit the resume of the competent person responsible for monitoring the air quality during underground construction.

3. The atmosphere in all underground work must be tested as often as necessary to assure that the atmosphere contains at least 19.5% oxygen, but no more than 23.5% oxygen. Continuous monitoring is recommended. These tests must be conducted before testing for air contaminants.

4. The atmosphere in all underground work must also be tested quantitatively for hazardous materials such as carbon monoxide, nitrogen dioxide, hydrogen sulfide, and other toxic gases, dusts, vapors, mists and fumes.

5. If an IDLH (Immediately Dangerous to Life and Health) atmosphere is present, the caisson then becomes a permit required confined space and Turner’s Confined Space Entry Procedure is implemented.

6. The competent person must keep a daily record of all air quality test results and submit those results to Turner, on a weekly basis and/or upon request.

7. The full depth of the shaft must be supported by casing or bracing.

8. The casing or bracing must extend 42” + or – 3” above ground level.

9. This height may be reduced to 12”, provided a standard railing is installed, the ground surrounding the shaft is sloped away from the shaft and effective barriers are in place to prevent mobile equipment from jumping over the 12” barrier.

Welding and Cutting

I. Policy Statement

Each contractor working on a Turner project must comply with 29 CFR 1926, Construction Industry Regulations, Subpart J – Welding and Cutting, in addition to the following guidelines.

II. Procedure

1. Gas Welding and Cutting
    a) Transporting, Moving and Storing Compressed Gas Cylinders
        - Valve protection caps must be in place and secured.
        - Cylinders must be moved by gently tilting and rolling them on their bottom edges.
        - When cylinders are hoisted by cranes, or other mechanical means, magnets or choker slings must not be used.
        - When cylinders are moved by powered vehicles, they must be secured in a vertical position to the vehicles by a metal bracket designed for this purpose.
        - A suitable steadying device must be in place to keep cylinders in a vertical position when in use.
        - Damaged or defective cylinders must be taken out of service immediately.
        - Oxygen cylinders in storage must be separated from fuel gas cylinders by a minimum distance of 20'. A secondary option is to separate the cylinders using a non-combustible barrier at least 5' high that has a fire rating of 30 minutes. All torch carts are required to have a fire rated barrier between the cylinders.

    b) Placing Cylinders
        - Cylinders must be kept far enough away from the actual welding or cutting operation so that slag, sparks or flame will not reach them.
        - Cylinders containing oxygen, acetylene or other fuel gas must not be taken into confined spaces.

    d) Use of Fuel Gas
        - The employer must instruct the employee in the safe use of fuel gas.
        - Before a regulator is connected to a cylinder valve, the valve must be opened slightly and closed immediately. This "cracking" of the valve must be done each time before a regulator is connected.
        - Flashback arrestors must be installed at the torch head and at the regulators and used according to manufacturer's recommendations. Under these circumstances, the arrestors are designed to stop the backflow (reverse flow) of unwanted gas and/or flashback into the upstream equipment.
        - Flashback arrestors must be routinely inspected, per manufacturer's recommendations.
        - All hoses must be routinely inspected, per manufacturer's recommendations. Specific issues include cracking and dry rot.

    e) Regulators and Gauges
        - Oxygen and fuel gas pressure regulators must be in proper working order, per manufacturer's recommendations, while in use.

- The regulators & gauges must be removed from the cylinders at the end of each shift.

2. Arc Welding and Cutting
   a) Manual Electrode Holders
      - Only manual electrode holders designed for arc welding and cutting, and are capable of handling the maximum current, can be used.
      - Any and all current carrying parts of the holder must be fully insulated.
      - When welding is not taking place, the rod cannot be left in the stinger.

   b) Welding Cables and Connectors
      - All arc welding and cutting cables must be completely insulated, flexible and capable of handling the maximum current necessary to complete the work.
      - The cables must be free from splices or repair, a minimum distance of 10', from the cable end to the electrode holder.
      - Cables in need of repair, beyond the distance noted above, can be repaired using friction or rubber tape, per manufacturer's recommendations.

   c) Machine Grounding
      - The ground return cable must have a current carrying capacity equal to or greater than the maximum specified output of the arc welding or cutting unit.
      - When a single ground is used to service several machines, the current carrying capacity must be equal to or greater than the total maximum specified output of all the machines which it services.

   d) Shielding
      - All arc welding and cutting operations must be shielded by non-combustible or flameproof screens, which protect employees and other persons working in the area from the direct rays of the arc.

3. Fire Prevention
   a) When practical, the object to be welded, cut or heated should be moved to a designated safe location, away from flammable liquids and other combustibles.

   b) If the object cannot be moved, positive means must be taken to confine the heat, sparks and slag.

   c) A 20 lb., ABC dry chemical extinguisher or equivalent must be immediately available in the work area and must be maintained in a state of readiness for instant use.

   d) Drums, containers or hollow structures, which have contained toxic or flammable substances, must be filled with water and thoroughly cleaned, ventilated and tested before welding or cutting on them.

   e) Hot Work Permits must be used and are valid for one shift only.

   f) A fire watch must be maintained at least 30 minutes (60 minutes depending on client expectations) after the hot work completion.

Turner

Section 4

TURNER RISK MANAGEMENT CORPORATE ENVIRONMENTAL, HEALTH AND SAFETY POLICY

Occupational Health

Blood-borne Pathogen Prevention Policy

I. Policy Statement

This program will apply to all Turner employees who could be "reasonable anticipated", as a result of performing their job duties, to come in contact with blood and other potentially infectious bodily fluids. Turner employees trained and certified in first aid and CPR who might be "reasonable anticipated" to come in contact with bodily fluids also must follow the rules and regulations set forth in this program.

II. Procedures

1. When dealing with blood or other bodily fluids, Turner employees are required to follow Universal Precautions. Accordingly, all human blood and other human body fluids are treated as if known to be infectious for HIV, Hepatitis B, and other blood-borne pathogens.

2. All jobsite and business unit offices are required to provide employees with disposable latex gloves and one-way resuscitation masks.

3. All certified first aid providers are required to wear disposable latex gloves and eye protection while performing first aid on an injured individual. If rescue breathing or CPR is performed, a one-way resuscitation mask shall be provided for the protection of the injured and the provider.

4. All blood spills shall be immediately contained and cleaned with an anti-viral solution, or by a solution of 5:1 water to bleach. In the event of a serious accident, Turner should consider contracting with an outside Hazmat firm.

5. Any material saturated with blood must be considered regulated waste. This means liquid or semi-liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; and items that are caked with dried blood or other potentially infectious materials. Discarded Band-Aids and gauze containing small amounts of blood products are not considered regulated waste. Disposal of all regulated waste shall be the responsibility of emergency medical personnel.

At least one Turner jobsite person shall be trained in First Aid, CPR, AED procedures and shall be trained in the decontamination of blood spills (Universal Precautions). All individuals are encouraged to attend training in emergency first aid procedures at each jobsite. At all times every project will have on site a FA/CPR/AED trained representative from Turner Construction and each subcontractor. Best Practice for each Turner representative to be trained in First Aid, CPR, AED procedures and shall be trained in the decontamination of blood spills (Universal Precautions).

Carbon Monoxide Exposure Prevention

I. Policy Statement

The purpose of this policy is to educate Turner employees and their subcontractors on the hazards associated with carbon monoxide exposure. Carbon monoxide is a highly-toxic, flammable, non-irritating, tasteless, colorless, odorless gas that is slightly lighter than air. Carbon Monoxide (CO) interferes with the oxygen-carrying capacity of blood. CO is non-irritating and can overcome persons without warning. Many people die from CO poisoning, usually while using gasoline powered tools and generators in buildings or semi-enclosed spaces without adequate ventilation. Some of the common symptoms of carbon monoxide poisoning are shortness of breath, headache, dizziness, muscular weakness and nausea. ALL fossil fuel (gasoline, diesel, propane, acetylene, etc.) burning equipment, when used where people are working in confined areas, produces carbon monoxide poisoning exposures.

II. Procedures

1. Testing Requirements - Use of any device that discharges the products of combustion into a work area where an employee exposure is possible, requires testing as defined below:

    a) Monitor the work area to determine the concentration of carbon monoxide at least three times during each 8-hour period. Monitoring shall be conducted with a UL approved monitoring device, such as a LEL/0_2/H_2S/CO 4-gas monitor.
    b) Monitor several different points within the area at the working/breathing heights of an employee.

    c) Maintain a record of these tests noting the date, time and result of each test. Provide the monitoring results to all affected employees within the work area, if requested. Once the project is complete, these records must be archived with Business Unit Safety Director.

    d) Remove the employees from the area when the concentration of carbon monoxide reaches 20 PPM. Supplemental ventilation and reduction or elimination of the source shall be provided to reduce the concentration below 20 PPM before the employees are allowed to resume work in the area.

    e) Continuous monitoring required when the concentration of carbon monoxide reaches a steady concentration of greater than 20 PPM in ambient air.

2. Use of Solid Fuel Salamanders - solid fuel salamanders are prohibited within buildings and on scaffolds.

    a) OSHA has interpreted that this rule was adopted to prevent fires and carbon monoxide hazards associated with the burning of spark-producing fuels (wood and paper) in open salamanders, and was not intended to apply to properly constructed and equipped solid fuel (coke and coal) salamanders used in structures under construction. The use of solid fuel salamanders (heating units with combustion exhausting into the surrounding enclosed atmosphere) are only allowed in open spaced areas.

III. Roles and Responsibilities

1. Turner Management:
   a) Conduct inspections of the workplace for compliance with this policy.

   b) Discuss policy applications during project orientations and pre-plan meetings with subcontractors.

   c) Conduct pre-planning meetings and require the use of Job Hazard Analysis (JHA) and Pre-Task Planning (PTP) meetings.

2. Subcontractor Management:
   a) Comply with and furnish materials necessary to meet the requirements of Turner policy.

   b) Attend and participate in any and all project orientations, pre-plan meetings, JHA discussions and PTP meetings.

3. Subcontractor Employees:
   a) Attend and participate in any and all project orientations, pre-plan meetings, JHA discussions and PTP meetings.

   b) Will comply with this policy.

IV. Best Practice

Preventing CO exposure by using tools powered by electricity or compressed air. Utilize engineering controls including exhaust scrubbers on equipment and the use of non CO type equipment. Never use a generator indoors or in enclosed or partially enclosed spaces such as garages, crawl spaces, tunnels and basements. Make sure the generator has adequate clear space on all sides and above it to ensure adequate ventilation. Provide for air blowers or other types of air exchangers. Do not use a generator outdoors if placed near doors, windows, vents air handlers etc. which could allow CO to enter and build up in occupied spaces.

Hearing Conservation Program

I. Policy Statement

Turner Construction Company recognizes that excessive noise can cause permanent hearing loss if appropriate administrative or engineering controls or personal protective equipment is not used. Limiting exposure to excessive noise through engineering controls is Turner's preferred method of control. The purpose of this policy is to prevent employee exposure to excessive noise exposure during construction activities. Each contractor working on a Turner project must comply with 29 CFR 1910.95 and 1926, Construction Industry Regulations, in addition to the following guidelines.

II. Procedures

Permissible Noise Exposures

Duration per day, hours	Sound level dBA, slow response
8	90
6	92
4	95
3	97
2	100
1 ½	102
1	105
½	110
¼ or less	115

1. Protection against the effects of noise exposure must be provided when the sound levels exceed those shown in the table above. The measurement must be observed on the A-scale of a sound level meter at slow response.

2. When employees are subjected to sound levels exceeding those shown above, feasible administrative or engineering controls must be utilized.

3. If such controls fail to reduce sound levels within the levels shown above, personal protective equipment must be provided and used to reduce the noise exposure.

4. In all cases where the sound levels exceed the values shown in the table above, a continuing, effective hearing conservation program must be administered.

5. All subcontractors must provide when requested by Turner Construction a comprehensive hearing conservation program prior to beginning work. At a minimum this program shall include:

    i. Noise survey data for typical work they perform.
    ii. Noise dosimetry data for typical exposures from the work they perform.
    iii. Training records for employees working on the Turner Project.

III. Roles and Responsibilities

1. Turner Management:
   a) Conduct inspections of the workplace for compliance with this policy.

   b) Discuss policy applications during project orientations and pre-plan meetings with subcontractors.

   c) Conduct pre-planning meetings and require the use of Job Hazard Analysis (JHA) and Pre-Task Planning (PTP) meetings.

2. Subcontractor Management:
   a) Comply with and furnish materials necessary to meet the requirements of Turner policy.

   b) Attend and participate in any and all project orientations, pre-plan meetings, JHA discussions and PTP meetings.

3. Subcontractor Employees:
   a) Attend and participate in any and all project orientations, pre-plan meetings, JHA discussions and PTP meetings.

   b) Will comply with this policy.

Hexavalent Chromium

I. Policy Statement

Hexavalent chromium (Cr(VI)) compounds are widely used in the chemical industry as ingredients and catalysts in pigments, metal plating and chemical synthesis. Hexa-chrom can also be found in the construction industry through welding or other abrasive methods, such as grinding or when the compound is heated on stainless steel or on hexa-chrom painted surfaces. Industrial uses of hexavalent chromium compounds include chromate pigments in dyes, paints, inks, and plastics; chromates added as anticorrosive agents to paints, primers, and other surface coatings; and chromic acid electroplated onto metal parts to provide a decorative or protective coating. The major health effects include lung cancer, nasal septum and skin ulcerations and contact dermatitis. The purpose of this policy is to prevent employee exposure to hexavalent chromium compounds during construction activity. Each contractor working on a Turner project must comply with 29 CFR 1926, Construction Industry Regulations, Subpart Z – Section 1126, Chromium (VI), Subpart D (Occupational health and environmental controls) 1910 Subpart I (PPE and respiratory protection) and Subpart J (Welding and cutting)in addition to the following guidelines.

II. Procedures

1. Permissible Exposure Limit (PEL)
   a) Since this construction activity is limited to specialty work, Turner will direct the Subcontractor to provide specific Job Hazard Analysis (JHA's) and Pre-Task Planning (PTP) meetings to address potential exposure.

   b) The Employer must ensure that no employee is exposed to an airborne concentration Cr(VI) in excess of 5 micrograms per cubic meter of air (5 ug/m3) calculated as an 8-hour time-weighted average (TWA).

   c) Engineering controls will be the preferred method to achieve the Permissible Exposure Limit (PEL).

2. Exposure Determination
   a) The subcontractor must determine the 8-hour TWA exposure for each employee exposed to Cr(VI). This may be accomplished using two options; scheduled or performance-oriented monitoring.

   b) Scheduled Monitoring
      - The subcontractor must perform initial monitoring to determine the 8-hour TWA for each employee on the basis of a sufficient number of personal breathing zone samples.
      - If the subcontractor does representative sampling, it must be conducted on the employee(s) expected to receive the highest exposure.
      - If the monitoring indicates that employee exposures are below the action level (1/2 the PEL or 2.5 ug/m3), the employee may discontinue monitoring.
      - If the monitoring indicates that employee exposures are at or above the action level, the subcontractor must perform periodic monitoring at least every six months.

c) Performance-Oriented Monitoring
- If this option is chosen, the subcontractor must determine the 8-hour TWA for each employee on the basis of any combination of air monitoring, historical data or objective data sufficient to accurately characterize employee exposure to Cr(VI).

3. Methods of Compliance
- As stated previously, engineering and work practice controls must be used to reduce and maintain employee exposure to Cr(VI) to or below the PEL.
- If feasible engineering and work practice controls are insufficient to reduce exposure below the PEL, then respiratory protection must be used.
- The subcontractor **will not** be allowed to rotate employees to different jobs to achieve compliance with the PEL.

4. Respiratory Protection

a) All Turner employees must comply with the Business Unit Specific Respiratory Protection Program.

b) When needed, the subcontractor must provide a formal respiratory protection program. Examples include:
- Periods necessary to install or implement feasible engineering or work practice controls.
- Work operations where an employer has implemented all feasible engineering and work practice controls and such controls are not sufficient to reduce the PEL.
- Emergencies

5. Protective Work Clothing and Equipment
- Where there may be a hazard to the skin or eyes from exposure to Cr(VI) the subcontractor must provide, at no cost, protective clothing or equipment to the employee.
- The subcontractor must ensure that the employees remove all clothing and equipment that may be contaminated with Cr(VI) when the work is complete or at the end of the shift.
- The subcontractor must ensure that chromium-contaminated clothing is not removed from the workplace.
- When contaminated protective clothing or equipment is removed for laundering or cleaning, the subcontractor must ensure that it is stored and transported in impermeable bags or containers.
- The subcontractor must inform any person who launders or cleans clothing or equipment of the potential effects of exposure to Cr(VI) and that the clothing or equipment should be laundered or cleaned in a manner that minimizes skin or eye contact.

6. Hygiene Areas and Practices

- Where protective clothing and equipment is required, the subcontractor must provide change rooms that comply with 29 CFR 1926.51.
- Where skin contact may occur, the subcontractor must provide hand-washing facilities that comply with the previously noted standard.

7. Medical Surveillance
   a) The subcontractor must make medical surveillance available, at no cost, to employees who meet the following criteria:
      - Those who are or may be occupationally exposed to Cr(VI) at or above the action level for 30 or more days a year.
      - Those who are experiencing signs or symptoms of adverse health effects associated with Cr(VI) exposure.
      - Those exposed in an emergency.

8. Communication of Chromium
   - Must follow the same communication of hazardous chemicals highlighted in Turner's Hazard Communication Program.

9. Recordkeeping
   a) The subcontractor must maintain the following data records;
      - Air monitoring ,
      - Historical monitoring,
      - Objective data,
      - Medical surveillance.

III. Roles and Responsibilities

1. Turner Management:
   a) Conduct inspections of the workplace for compliance with this policy.

   b) Discuss policy applications during project orientations and pre-plan meetings with subcontractors.

   c) Conduct pre-planning meetings and require the use of Job Hazard Analysis (JHA) and Pre-Task Planning (PTP) meetings.

2. Subcontractor Management:
   a) Comply with and furnish materials necessary to meet the requirements of Turner policy.

   b) Attend and participate in any and all project orientations, pre-plan meetings, JHA discussions and PTP meetings.

3. Subcontractor Employees:
   a) Attend and participate in any and all project orientations, pre-plan meetings, JHA discussions and PTP meetings.

   b) Will comply with this policy.

Infection Control Policy

I. Policy Statement

During the planning process of the construction project, it is important to remember that a hospital is an occupied critical care facility, whose primary function is that of patient care. A construction project can be intrusive to medically fragile patients. All construction projects have the potential to impact infection control in patient areas.

The purpose of this policy is to minimize the potential acquisition of nosocomial infection in patients during hospital construction activities.

II. Procedures

The following are highlights of Turner's Infection Control Construction Policy. These guidelines are provided as a foundation for developing a site-specific control policy that may mirror or compliment an Owners program. An example may be found in the Engineering and Technology Safety section of the TKN2 document management system and in Appendix G of this manual.

1. Planning Phase
    a) Number and placement of isolation rooms,
    b) All air vents must be blocked off and sealed to prevent contamination of duct system before construction begins,
    c) Air handling systems,
    d) Ventilation shall be a high priority item,
    e) Dust mats must be used at the entrances to all work areas,
    f) Number and placement of hand washing facilities,
    g) Staff and patient traffic patterns for the duration of the project,
    h) Relocation decisions regarding patient care areas, storage areas, etc.
    i) Water supply and plumbing,
    j) Waste containment, transport and disposal,
    k) Selection of finishes and surfaces that can be effectively cleaned in clinical areas,
    l) Accommodation of personal protective equipment,
    m) Storage of moveable modular equipment.

2. Operational Phase
    a) Medical waste removal,
    b) Integrity of barrier walls,
    c) Environmental control,
    d) Traffic control,
    e) Cleaning,
    f) Contractor personnel requirements,
    g) Environmental monitoring,
    h) Policy implementation.

3. Completion Phase
    a) Ventilation specifications,
    b) Disinfection procedures,
    c) Water line flushing,
    d) Water line disinfection.

4. Compliance Monitoring
    a) Air handling,
    b) Integrity of barrier walls,
    c) Dress code,
    d) Environmental control,
    e) Noise,
    f) Traffic control,
    g) Water supply.

III. Roles and Responsibilities

1. Turner management:
    a) Shall hold an infection control specific pre-planning meeting with the owner and affected subcontractors prior to all work that requires an infection control plan.

    b) Shall conduct inspections of the workplace for compliance with policy.

    c) Shall cover policy applications during project orientation with subcontractors.

2. Subcontractor management:
    a) Shall comply with and furnish materials necessary to comply with Turner policy.

    b) Shall attend relevant pre-planning meetings, project orientation, and fully participate in the Job Hazard Analysis program.

A comprehensive sample of the Infection Control Plan 2013 is available in Appendix G of this manual.

Lead

I. Policy Statement

Turner is not in the business of performing lead abatement work.

It is the policy of Turner to refrain from engaging in the removal or abatement of lead containing materials when performing renovation or building activities. Turner will request that owners have an inspection made by a certified testing company, industrial hygienist, or lead removal contractor prior to the start of work. Where lead is found, the owner must contract for its removal. Turner must obtain certification that the lead has been removed and the area is safe to work.

II. Procedures

1. Prior to the start of work, Turner will request the building owner to provide a pre-demolition survey for lead based materials, prepared by a qualified consultant.

2. All individuals must receive Lead Hazard Awareness Training prior to beginning work in areas that have materials containing lead.

3. If the assessment identifies lead containing material, Turner will request that the owner remove or abate the area of concern and provide written certification (e.g. clean letter) that the ambient condition of the area is below OSHA's action level for lead (<30ug/m3).

4. If lead is encountered during construction activity, Turner will stop work and request that the owner remove or abate the material.

5. Before resuming work, The Turner Superintendent will request a written certification (e.g. clean letter) that the ambient condition of the remediated area is below OSHA's action level for lead (<30ug/m3).

6. If the owner requests that Turner perform the abate work, a contract of convenience must be entered into with Turner and only qualified remediation contractors, who satisfy company pollution liability requirements, will be retained.

7. The Turner Superintendent must notify the Business Unit Safety Director (BUSD) and the BU Claims Coordinator. They will then notify the appropriate Turner Risk Management Regional Claims Manager.

8. The BUSD will complete the Turner Environmental Risk Investigation Report and submit it to the Business Unit Operations Manager, National EH&S Coordinator, and the Risk Management Department Claim Director.

9. If Turner is contractually obligated to manage the remediation the Business Unit must secure written approval from the National EH&S Coordinator and the Risk Management Claim Director as required by the Environmental Operational Policy.

10. A Lead Compliance Plan that includes negative exposure assessments by work activities will be required if Turner or their subcontractors are required to disturb lead based painted surfaces during demolition or renovation activities. This plan includes the requirements for engineering controls, work practice controls, personal protective equipment, HEPA vacuums, respirators, air monitoring and dust controls for protection from exposure to lead. The Plan will provide guidance for complying with the regulatory requirements of 29 CFR 1926.62 Lead.

III. Roles and Responsibilities

1. Turner Management:
   a) Must ensure compliance with this policy.

   b) Must discuss policy applications during project orientation with subcontractors.

   c) Must provide Lead Hazard Awareness Training to all employees working in or around material containing lead.

2. Subcontractor Management:
   a) Must comply with and furnish materials necessary to comply with Turner policy.

   b) Must attend and participate in the Lead Hazard Awareness Training.

3. Subcontractor Employees:
   a) Must attend and participate in project orientations and Lead Hazard Awareness Training.

   b) Must report immediately anytime lead containing material is discovered or disturbed.

A comprehensive sample of Written Lead and heavy metal Program is available in Appendix F of this manual.

Medical Services Staffing Policy

I. Policy Statement

First aid and medical services are important components of Turner's loss prevention and injury management efforts. If the project is not reasonably accessible to a medical care facility, each subcontractor must have one person on site with a valid certificate in first aid and CPR. Turner Construct will have at all times an individual on site with a valid certificate in first aid and CPR.

II. Procedures

1. CCIP's with a contract volume in excess of $100 million dollars will be required to ~~supply~~ a staffed medical trailer. National contracts have been signed with several vendors. Contact the Business Unit Safety Director or Turner Risk Management for a list of vendors in your area. If the project is on a Hospital campus or a healthcare facility is in the immediate vicinity of the project, the healthcare facility can be used to meet this requirement.

2. Implement the placement of AEDs (Automated External Defibrillators) in business unit offices and consider AED placement on projects.

3. First aid supplies must be easily accessible. In addition to the First Aid Kit Turner Supplies, each subcontractor kit must be in compliance with Turner's Bloodborne Pathogen Policy.

4. The contents of the first aid kit shall be placed in a weatherproof container with individual sealed packages for each type of item, and must be inspected at least weekly.

5. Emergency telephone numbers must be conspicuously posted. For serious incidents, the National Crisis Hotline must be implemented, per Turner policy.

6. Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body must be provided within the work area for immediate emergency use.

Respiratory Protection

I. Policy Statement

Turner Construction Company is committed to maintaining an injury and illness free workplace and will make every effort to protect employees from harmful airborne substances.

This will be accomplished through engineering controls such as ventilation or substitution with a less harmful substance or through administrative controls limiting the duration of exposure. When these methods are not adequate, Turner will provide training, fit-testing, medical surveillance, and proper respirators to allow Turner employees to breathe safely in potentially hazardous environments.

Turner recognizes that respirators have limitations and their successful use is dependent on an effective respiratory protection program. Our full Respiratory Protection Program is designed to identify, evaluate and control exposure to respiratory hazards and to provide for the proper use, care and maintenance of respiratory equipment. Each Business Unit affected must oversee a written respiratory program. Prior to implementation the Business Unit Safety Director shall approve program elements.

This program is designed for Turner Construction Employees. Subcontractors are required to submit and have approved by Turner their company's respiratory protection program prior to start of work. Compliance with this policy applies to filtering face-piece respirators (dust masks) as well.

All programs shall meet or exceed Federal, State, and Local regulatory requirements.

II. Program Elements

1. Highlights of a Business Unit Specific Program are to include the following:

a) Program Administration
- A formal annual audit of the Respiratory program is required for all companies who actively using respirators. A Respirator Program Evaluation Worksheet should be used to document the evaluation and to record recommended changes.

b) Workplace Exposure Assessment & Ongoing Surveillance
- Exposure assessment is critical in identifying harmful airborne contaminants, their extent and magnitude and how to control them.
- Turner Project Staff (TPS) must make every effort through evaluations and training to ensure that employee exposure does not exceed permissible concentrations
- Results of these evaluations will be summarized and a record maintained in the jobsite project files. Additional evaluations are necessary if exposures change due to new materials, process changes or other conditions increasing the degree of employee exposure. Copies of all results shall be sent to the Business Unit Safety Director who shall maintain an archive for 30 years for all Turner employees evaluated.
- Subcontractors shall provide proof of exposure assessments, training, and medical surveillance for their employees prior to performing work with any material that may require respiratory protection.
- Subcontractors may not perform any work with chemicals or materials that may cause a respiratory hazard or nuisance odor for Turner Employees, other Subcontractors, or the

general public without scheduling the work with Turner. Examples of such activities include applying hazardous paints or coatings; saw-cutting or grinding concrete, applying spray on fireproofing.

c) Respirator Selection
- In those instances where engineering and administrative means do not achieve the desired control, respirators must be worn. Different types of respirators are available for a variety of applications. Turner must ensure that the proper NIOSH/MSHA approved respirator is selected and used for the kind of work being performed and the hazards involved.
- Respirator selection information must be completed to document the selection process.

d) Evaluating Respirator Wearer Health Status
- Even with appropriate equipment and adequate training provided, an employee's health status must be considered before allowing respirator use. The wearer's physical and medical condition, duration and difficulty of the tasks, toxicity of the contaminant and type of respirator all affect an employee's ability to wear a respirator while working. Therefore, Turner must ensure that each employee's physical ability to wear a respirator is evaluated.
- Each respirator wearer will be given a medical evaluation. The project will make appropriate arrangements with a proper medical organization to perform the evaluation. The Medical Evaluation and Work Restriction report must be completed for each individual.

e) Respirator Fit Testing & Assignment
- After selection of the appropriate type of respirator and verifying the employee's ability to work while wearing a respirator, Turner will ensure that a qualitative fit test is conducted to choose the best fitting face piece and determine the specific brand, model and size for each employee. The Qualitative Fit Test Record form will be completed. The form will record test results and document respirator assignment.
- Quantitative fit is the preferred alternative to qualitative fitting. Although it requires specialized equipment and trained personnel, some exposures require a quantitative fit test.

f) Training
- Once the employee is fitted with the correct respirator for the task, that employee must be thoroughly trained in the need, use, limitations, inspection, fit checks, maintenance and storage of the equipment. This training may be initiated during the fit test.
- The manufacturer of the equipment provides detailed instructions for use and care of the respirator, and this information is to be used in the training. The Respirator User Training and Education Form is to be used as a guide and record of training received.

g) Record keeping
- Turner must document each major component of the program to verify that each activity has occurred and evaluate the success of the program to satisfy regulatory requirements.
- These records include the written program, exposure determination, respirator selection, physical status evaluation, fit testing and respirator assignment, training form and program assessment.

- All records that involve Turner employees must be sent to the Business Unit Safety Director and archived for a minimum of 30 years.

A comprehensive sample of the Turner, Asbestos, Lead, Silica and Respirator Management Program is available in Appendix H of this manual.

Silica Exposure Prevention

I. Policy Statement

Exposure to silica can lead to silicosis, a serious and sometimes fatal respiratory disease. Silicosis develops from being exposed to and breathing in silica dust. Excessive amounts of silica dust may be generated during activities such as: sandblasting, rock drilling, roof bolting, foundry work, stonecutting, drilling, quarrying, brick/block/concrete cutting, granite operations, lead-based paint encapsulate applications, asphalt paving, cement products manufacturing, demolition operations, hammering, and chipping and sweeping concrete or masonry.

The following policy is designed to protect employees who may come into contact with silica during the course of their work.

This policy is designed for Turner Construction Employees. Subcontractors must be required to submit and have approved by Turner their company's Silica Exposure Prevention program prior to start of work.

II. Procedures

In order to determine whether a product contains silica, the Safety Data Sheet must be obtained and evaluated. In the event silica is present in products on-site, the following safe working procedures shall be followed to eliminate or control silica dust exposure:

1. The Project Safety Orientation should include information on potential areas for exposure and the hazards of silica exposure.

2. Engineering controls must be considered as a primary means to eliminate the hazard, whenever feasible.

3. Industrial hygiene exposure monitoring must be conducted in order to confirm that the engineering and administrative controls in place are effective and whether personal protective equipment (PPE) is or is not required.

4. If PPE is required, refer to Turner's Respiratory Protection Program for specific guidelines.

5. After working with products that contain silica, each individual will be required to thoroughly wash their hands before eating, drinking or smoking. Eating, drinking or smoking near silica or in a silica-regulated areas is strictly prohibited.

6. Always wet dry materials and surfaces before cutting, chipping, grinding, sanding, sweeping or cleaning. This engineering control shall be used to the greatest extent feasible, so that airborne concentrations of silica are minimized.

7. Use power tools with built-in high-efficient particulate air (HEPA) dust extraction units to capture the dust before it is released into the exhausted air.

8. Turner will not allow the use of any compound used for abrasive cleaning that contains more than 1% silica. Employee sampling must be conducted to verify that concentrations released from the media being finished does not exceed allowable OHSA PEL's. For abrasive blasting,

replace silica sand with less toxic materials. The National Institute for Occupational Safety and Health highly discourages the use of sand or any abrasive with more that 1% crystalline silica in it. As an alternative, garnet, slag and steel grit and shot may be suitable substitutes.

9. All subcontractors are to supply any exposure monitoring, testing, or engineering information regarding silica exposure in their operations prior to beginning work. An example may be the masonry contractor using brick/block saws and associated experience data that the subcontractor has obtained.

Turner

Section 5

TURNER RISK MANAGEMENT CORPORATE ENVIRONMENTAL, HEALTH AND SAFETY POLICY

Subcontractor Requirements

Turner

Subcontractor Safety Program Requirements

Turner

SUBCONTRACTOR SAFETY PROGRAM REQUIREMENTS

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Turner

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5.1 Required Safety Documentation for Subcontractors

Complete Package and Submit to Turner Project Superintendent of Safety Prior to Start of Work

- ☐ 1. Safety and Health Program – Site Specific – Include Substance Abuse Program
- ☐ 2. CPR/First Aid Training Cards with Expiration Dates
- ☐ 3. Identify Trained "Competent Persons" Per OSHA (see next page).
- ☐ 4. Insurance Certificates (enrollment info for CCIP or OCIPs also)
- ☐ 5. OSHA 30 Hr. Construction Safety Trained Personnel (submit a copy of cards) or enroll in 30-Hour on Turner University.
- ☐ 6. MSD-Sheets and Chemical Inventory List with HAZCOM Program. (Form #1)
- ☐ 7. Fall Protection Documentation Training (if exposed to fall hazards)
- ☐ 8. Fall Protection Site-Specific Plan (if exposed to fall hazards)
- ☐ 9. If you have a crane provide: Annual Inspection Certification, Operators Qualifications or Certifications, Monthly Crane Inspection, Daily Crane Inspection, Pick Plans, Critical Lift Plans (Form #2C), Crane & Off-Road Vehicle Inspections (Form #2B) *all crane inspections must be performed by a third party.
- ☐ 10. Job Hazard Analysis Forms (JHA) (Form #6)
- ☐ 11. Fork Lift Training Cards (Submit cards if applicable)
- ☐ 12. Scissors Lift and Aerial Boom Lift Training Cards (Submit cars if applicable)
- ☐ 12. Ladders Last Permit & Inspection Form (Form #2a)
- ☐ 13. Daily Submit Pre-Task Plan (Form #7)
- ☐ 14. Weekly Documentation
  - A. All Daily Inspection Sheets for Cranes, Equipment, Scaffolds, Lifts, Forklifts,
  - B. Weekly Safety Meeting Minutes
  - C. Weekly inspection of fall protection system.

Key Personnel and OSHA Competent Person

Company Name _____ **Project Name** _____

Superintendent _____ **Contact Phone #** _____

On-site Safety Coordinator _____ **Contact Phone #** _____

Company Safety Director _____ **Contact Phone #** _____

Turner

OSHA Regs requiring a Competent Person	OSHA Standard	Your Competent Person(s) (If applicable)
General Safety and Health Provisions (All Contractors)	**1926.2**	
Fall Protection	**1926.502**	
Excavations	**1926.65**	
Respiratory Protection (If your work requires PPE)	**1926.103**	
Rigging for Material Handling (Riggers & Signal Persons)	**1926.251**	
Cranes (Operators & Assembly/Disassembly Supervisors)	**1926.1400**	

Scaffolding	**1926.451**	
Steel Erection: Bolting, Riveting, Fitting Up, and Plumbing Up	**1926.752**	

Turner

5.2 OVERVIEW OF PROJECT SAFETY REQUIREMENTS

**** NOTE*: *This "Subcontractor Safety Performance Package" contains an overview of the general Turner Project Safety Program and may include trade or site specific attachments. It is prepared as a convenience for Subcontractors, but is not a substitute for a Subcontractor's SH&E Program, which must meet or exceed the requirements of the Turner Site Specific Safety Program(, the applicable parts of the Turner Safety, Health, and Environmental Policy Manual, the contract documents and Federal, State, Local or other applicable regulations. Turners Site Specific Safety Program and SH&E Manual can be obtained from the Turner Business Unit Safety Director.***

All Subcontractors and sub-tiers on the project are required to know and follow the contents of this safety program and the Project Site Specific Safety Program. All Subcontractors are solely responsible to train and educate their employees, and/or visitors as to the contents of this program. Documentation of this training, and all training, is the responsibility of the Subcontractor and proof of the training shall be made available to Turner upon request.

Please note that in the event of a conflict between the various programs, codes and regulations that the most stringent will be the one considered applicable. Turner has adopted in some cases more stringent policies on its projects that must be adhered to. Turner Construction Company's Business Unit Safety Director must approve any deviation of these policies.

The Subcontractor must identify the Safety Representative/Competent Person *(hereafter referred to as Safety Representative)* to Turner as the primary, on-site contact for safety related issues. The Safety Representative may be a Supervisor and **they shall have as a minimum, the OSHA 30 Hour construction safety training**. **Subcontractors awarded work must commit their key field supervisory staff assigned fulltime to the project to complete the Turner/OSHA 30-Hour Construction Safety Certification training course. The OSHA Hour 30 Class is available online at Turneruniversity.com. One person is required for contracts under 5 million and at least two for those over 5 million, per subcontractor. Documentation of training must be submitted to Turner Construction Company before the company starts work onsite.** The subcontractor will provide a translator when there are non-English speaking workers on site. All training, safety meetings, etc. must be communicated in every applicable language.

The Subcontractor's on-site Supervisor and/or the Subcontractor's designated on-site Safety Representative must schedule and attend a **Pre-Construction Safety Meeting** with the Turner Project Safety Manager or BUSD (Business Unit Safety Director) to discuss the Subcontractor Safety Requirements. The Pre-Construction Safety Meeting should take place at least five (5) working days before startup to allow for review of required documentation.

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

The Subcontractor will provide a First Aid trained Competent Person when one or more of the Subcontractor's employees are working. The name of the qualified First Aid/CPR person and proof of certification shall be submitted to Turner Construction Company.

The Subcontractor's Supervisor(s) and Safety Representative must make **frequent and regular inspections** of their work areas and activities. Hazards identified that are under their control must be corrected immediately and all other identified hazards must be reported to the Turner Project Superintendent. These inspections are to be documented and available by request for review by Turner Construction Company.

The Subcontractor's Superintendent(s) and Designated Safety Representative must attend the **Weekly Subcontractor Coordination Meeting and participate in the Safety Committee** where safety issues will be addressed. **Emergencies** shall be handled through the Turner Field Office according to the posted Emergency Procedures and Crisis Management Plan.

All work-related injuries, regardless of severity, must be reported to Turner (immediately) after they occur. Further, all work-related injuries will be recorded on the "**Injury Log**" (Standard Form #5). A completed **"Injury Log"** will be submitted to Turner by the (3rd) of the month for the previous month.

Incidents involving the general public and injuries that result in or are likely to result in lost time must be reported to Turner immediately. A Supervisor's Accident/Incident Investigation Report must be completed by the appropriate Subcontractor Supervisor and submitted to Turner within 24 hours of the accident/incident. (Form available from Turner) Subcontractors are required to comply with and provide modified/light duty work. On Contractor Controlled Insurance Programs (CCIPs), there may be a monetary penalty to subcontractors for failing to report an incident within 24 hours or refusing to return a worker to modified/light duty.

Contractor's Principal Meeting for Lost Time Incidents

If a Contractor's employee experiences or causes a Lost Time Incident on the Project, an Owner or Officer of the Contractor shall attend a meeting at the job site to discuss the incident. This meeting will be called by the Project Manager and will be conducted within 5 business days of the time of the incident. Personnel required to attend the meeting include Turner's Project Management team.

EMR Waiver Policy

If a subcontractor or any of its tiered employers has an EMR greater than 1.0, a Risk Mitigation Plan must be developed and submitted to Turner prior to beginning work on site. An EMR Waiver request must also be completed and submitted to Turner Purchasing/BUSD for recommendation to be approved by the Corporate Health & Safety Director.

Drug & Alcohol Testing

All Subcontractor employees are required to be drug tested. Please refer to The Turner Corporation Substance Abuse Program **Section 3**, which will be provided by Turner. Subcontractors will incur any and all costs associated with the Substance Abuse Program. Turner strictly adheres to a drug screen for pre-hire, post-accident, random and reasonable suspicion. Alcohol testing is to be done for post-accident, random and reasonable suspicion. Alcohol testing of pre-hire candidates is discretionary. Any employee

found using or in possession of illegal drugs or alcohol on the job will be subject to immediate removal from the jobsite.

Job Hazard Analysis (JHA) and Pre-Task Planning (PTP)

A Strategy Meeting shall take place to identify critical activities planned for the week. Additionally, A Job Hazard Analysis (JHA, Standard Form #6) shall be completed for each activity and submitted to the TCCo Superintendent or Site Safety Manager for review. The JHA must be submitted a minimum of 7 days prior to start of work.

Prior to the actual start of work, the first line supervisor should conduct a Pre-Task Planning (PTP, Standard Form #7) meet with the crew performing the work. The PTP is to be filled out by the individual crews in the field that will be performing the work and shall be kept near the work location. If the task being performed that day changes, it shall be noted in the PTP. The PTP will be signed by the crew, foreman and safety person (if applicable) and PTP audits will be performed by Turner.

The JHA is designed for use as an **Operation(s) Specific Training** tool to help plan activities and to comply with OSHA's 29 CFR 1926.21 (b). Employees must be trained in:

- The hazards specific to the site and the operations involved,
- How to identify the hazards,
- How to prevent, eliminate, avoid and/or protect themselves from the hazards. (Selection and use of PPE)
- Who is responsible for housekeeping (clean up) and how often it will be performed.
- Clean-up/housekeeping. This must be addressed on the JHA before it is accepted.
- An additional task-specific JHA may be required for operations with special hazards.

Employee Safety Training

All personnel assigned to the Project are required to complete the Project Safety Orientation conducted by Turner. All subcontractors shall schedule with the Superintendent/Project Safety Manager an onsite safety orientation prior to start of work at this project. All personnel are required to attend this orientation**. Employees who have not attended the Turner Safety Orientation will not be permitted to work on site.** All employees completing the orientation will be issued an orientation sticker/badge to be displayed on their hard-hat/vest.

Additional OSHA Construction Standards that require specific training include, but **are not limited to**:

- **Hazard Communication Training** - 29 CFR 1926.59/GHS
- **Stairway and Ladder Safety Training** - 29 CFR 1926.1050.
- **Fall Protection Training** - 29 CFR 1926. 503
- **Personal Protective Equipment** - 29 CFR 1926.95
- **Scaffold Training** - 29 CFR 1926.450

Prior to workers coming on site, subcontractor must ensure workers are trained in the above standards and any other State, Federal, Local, or owner required training. These records should be reviewed with Turner's on site management.

Weekly Tool Box Talk Safety Meetings

Project employees must attend at least one "Tool Box Talk" safety meeting each week. Copies of meeting minutes must be submitted to Turner Construction with the Subcontractor Daily Progress Report for the day the meeting is held. Meeting minutes must indicate the name of the Subcontractor and date of the

meeting. The supervisor(s) and the attendees must sign minutes. Turner Construction Company may make available “Just in Time” training topics for use periodically.

Housekeeping

Cleanup must be performed as the work is put in place, not just at the end of the day. All trash, debris & scrap materials are to be placed immediately upon creation into rolling trash bins or hoppers that do not require workers to lift or carry. In the event housekeeping isn’t being performed subcontractor agrees to provide manpower for a composite crew. The values for a subcontractor's Safety Program and Cleanup Program including the level of manpower contribution to a Composite Cleanup Crew will be determined prior to the execution of the Contract.

- **Glass containers** are not permitted on site.
- Each Subcontractor for the disposal of break trash and drinking cups must provide containers**. At no time will food trash be left lying around.**
- **Protruding nails** must be bent flat or removed as the work proceeds and before disposal.
- **Off cuts of welded wire mesh** must be tied into the pour or placed in a trash container as they are cut.
- **Banding iron** must be flattened and/or placed in a proper trash container, as the bands are broken.
- **Off cuts of round stock** such as all-thread rod and conduit must be contained as they are cut.

Water Infiltration and Water Damage

The safety program should include details and systems to minimize water infiltration to areas under construction and the prevention of water damage to materials from conditions that include but not limited to work activities, weather conditions and other water producing activities. The plan should include the protection of stored materials that are susceptible to water damage such as drywall, ceiling tiles, gypsum board (sheetrock), cardboard, paper, other cellulose surfaces, carpet and other materials that can be damaged by water. Work activities that result in water intrusion in the construction areas such as core drilling, fire system testing, waterline testing and other water producing activities must address drying out procedures, containment and minimizing water flow. The BUSD/Claims Manager must be notified of any water event.

Smoking

Smoking will be permitted at designated locations as determined by Project Requirements.

Potable Water

Subcontractors shall provide potable water in all work areas and trash receptacles for used cups for their employees. Water must be available for employees to wash hands for sanitary purposes in accordance with OSHA 1926.

Proper Dress Attire

Long pants that cover the ankle, shirts with sleeves (4 inch) and sturdy work shoes/boots must be worn at all times. Shorts, sleeveless shirts and athletic or tennis type shoes soft soled shoes, high heels, open toed sandals or shoes not covering the top of the foot will not be permitted. Inappropriate language or derogatory remarks on clothing is not permitted onsite and will not be tolerated. Workers exposed to hot tar must also wear long sleeved shirts and gloves. Workers who work directly with hot tar must also wear a full apron and face shield.

Hard Hats must be worn 100% of the time on the project. The hard hat must display company name and employee name. All hard hats shall be worn with the bill forward. (Cowboy hard hats, aluminum hard hats

and bump caps are not permitted on Turner projects.) Employees exposed to 600V or greater shall wear hard hats that meet ANSI Z89.2 type hard hat.

Welding shields must be worn with a hard hat.

Eye Protection: Safety Glasses with side shields that meet the requirements of ANSI Z-87.1 must be worn at all times on the project. During the following operations, face protection in addition to approved safety glasses or goggles are required: welding, burning or cutting, using abrasive wheels, chop saws, portable grinders or files, chipping concrete, stone or metal, drilling or working under dusty conditions, using explosive actuated fastening or nailing tools, overhead work, work with hazardous liquids or gasses. Dark lenses are not to be worn inside of buildings, in enclosed areas or at night.

Hearing Protection: Employee exposed to noise excess of 85 dBA, their employer will provide hearing protection which will reduce the noise to an acceptable level. If noise levels are determined to cause an 8 hour TWA exposure greater than 85 dBA, the subcontractor shall be required to submit a detailed hearing conservation program to Turner. This program shall be approved prior to beginning work.

Foot Protection: Metatarsal foot covers must be used with jumping jack compactors and jackhammers. Some jobs may require steel/composite toed work boots.

Hand Protection: Cut resistant gloves are required when using knives or sharp material. Additional hand protection may be required depending on the hazard assessment.

Reflective Vest: Must be worn by employees when their work activities are in proximity to operating heavy equipment. It is recommended that high visibility shirts are worn in all other areas.

Communication Devices

Turner Construction Company prohibits the use of handhelds* on a Turner jobsite while operating vehicles, repositioning, moving or backing up equipment (lifts, excavators, tractors, dozers, etc.). Construction equipment to include cranes, scissor and aerial lifts, earthmoving, hauling, and excavating equipment, except for radio's when radios are the primary means of controlling the operation of the equipment**.**

*Mobile Handheld Units are handheld devices, including cell phones, Blackberries, IPhones, PDA's, MP3 players (or equivalent), radios, and other listening or communication devices.

Chemicals and Other Potentially Hazardous Materials

A copy of the Subcontractor's **site specific Chemical Inventory List (**Standard Form #1) and **SDS** must be submitted to Turner and updated as applicable. A **Project HazCom Station** will be established and maintained in the Turner Project Office. The Turner HazCom Station does not eliminate the need or requirement for the Subcontractor to establish and maintain a HazCom Program including training for its employees.

In the event unknown and/or potentially **hazardous materials** are encountered during construction, that portion of the work will stop and Turner will be notified immediately. Work will not resume until the Turner Project Manager, Project Superintendent, BUSD, or third party administrator authorizes it.

Exposures must be controlled through engineering methods, or otherwise arranged so as not to affect others to the satisfaction of Turner Construction. Turner may require air monitoring or sampling to demonstrate non-exposure at the subcontractor's expense.

Fall Prevention

Turner maintains a **zero tolerance policy** for fall prevention infractions. Anyone found violating this policy may be removed from the site immediately and his or her company may be subject to a monetary penalty. Each subcontractor will conduct/document a weekly inspection of their fall protections systems (attached form).

Subcontractor employees are required to provide and use 100% fall prevention systems whenever exposed to a fall 6' or greater, including any leading edge work. This can be accomplished through the use of a safety net system, personal fall arrest system or a guardrail system. Turner does not allow the use of a Safety Monitor System.

Subcontractors shall submit their fall prevention plans and proof of fall protection training for all their employees to Turner Management prior to beginning work on site. A Competent Person/Individual Workers shall inspect their fall protection equipment/fall prevention systems prior to their use. Subcontractors shall instruct all of their employees as to the means and methods of fall prevention provisions. Subcontractors shall direct their employees to comply with and maintain the guardrails, marked hole covers and other fall prevention systems installed on site. Turner requires any hole cover greater than 18"X18" will be protected by a guardrail system. Hole covers shall be secured in place to prevent displacement, be capable of supporting 2 times the maximum intended load & labeled or marked properly. Wood guardrail support posts shall not be more than 8 feet on center.

Subcontractor employees shall not remove or by-pass any of the fall prevention devices unless they have notified Turner and alternative fall prevention provisions have been agreed upon and implemented. Subcontractor is to notify Turner of defects or deficiencies of prevention systems before starting to work in an area to avoid being held responsible for corrective actions taken by Turner.

Guardrail systems, unless designed by a Professional Engineer, will not be permitted as attachment points for personal fall arrest or positioning device systems. Personal Fall Arrest Systems (PFAS) must always allow for 100% tie-off therefore where lanyards are used a double-lanyard system must be used for personnel transfers from tie-off points. Knots and rigging (slings, wire rope, shackles, etc.) are not permitted for fall protection. Horizontal lifelines shall be designed by an engineer and installed under the supervision of qualified person. A copy of the designed system must be made available to Turner upon request.

When using stilts, the floor must be free of material, cords & trash. If stilts are used in the vicinity, the rail must be increased by the height of the stilts used. Metal studs or similar cannot be used for guardrails.

When wire rope is used for guardrails, the cables may not be less than 3/8 inch aviation cable; any coatings used on the cables to prevent cuts or lacerations will be over the 3/8 inch diameter. When wire rope is used for top rails it shall be flagged at no more than six-foot intervals with highly visible materials and cannot have more than three inches of deflection.

For cable safety railings, cable connections of two cables must be looped and triple (drop forged) clamped at both connecting points. Single cables running past each other with one or two clamps are not

acceptable. When using cables for guardrail systems, closed turn-buckles are to be used every 3 bays or 100 feet, whichever is less.

If a warning line is to be utilized, it is to be placed a minimum 15 feet back from the edge and meet the following criteria:

- If a worker is required to work or enter between the warning line & the edge, 100% fall protection is required.
- The warning line height must be between 34" & 39" from the walking/working surface.
- The rope, wire or chain must have a breaking strength of 500 pounds and must be flagged every 6 feet.
- After erected, the stanchions must be secured from tipping due to wind, etc.

Hanging tarps from a guardrail system is prohibited. If hanging tarps, the tarps must be hung from a separate independent cable system.

The contractor responsible for installing the perimeter fall protection system shall submit a plan demonstrating the method, type, location of turnbuckles and indicating loading areas. The plan shall be submitted to the Turner Project Superintendent.

Concrete/Masonry Work

The concrete/masonry subcontractor shall provide an eyewash station within 75 feet of any concrete/masonry work. Area below concrete pours must be barricaded and posted with ample signage. Where employees must walk across rebar or slick surfaces, temporary walkways must be provided or installed to prevent trips, slips and fall hazards. No worker shall be permitted to apply cement, sand and water mixture through a pneumatic hose unless the employee is wearing the proper PPE including face protection. All masonry walls over 8 feet in height shall be adequately braced and remain in place until the permanent supporting elements of the structure are in place. A limited access zone must be established prior to the start of any masonry work. The zone must be equal to the height of the wall, plus four feet for the entire length of the wall.

Impalement Protection

Although current rebar caps (non-steel backed) are not a protection device as stipulated by the manufacturer, they can be used minimally for scratch protection only. Vertical or horizontal rebar or other impalement hazards shall be protected. It is required on this project that steel backed rebar caps be used or their equivalent. The use of mushroom caps is not permitted for impalement hazards.

Electrical

Ground Fault Circuit Interrupter (GFCI) protection is required for all electrical cords and tools including those plugged into permanent and portable generator power sources. Only three wire cords, 14 gauge or heavier, rated for hard or extra hard usage are permitted for use and they must be rated for the required amperage. All cords, hoses & welding leads are to be elevated at least 8 feet high near walkways, stairs or access points. When using permanent power, a GFCI "pigtail" device will be required between the receptacle and the extension cord. Each contractor will be responsible for providing and maintaining temporary GFCI's for his or her employees if a GFCI receptacle is not available.

An assured equipment grounding conductor program cannot be used in lieu of GFCI's. The installing contractor, i.e. the electrical subcontractor, shall test each power receptacle for proper installation including polarity, grounding, etc. The electrical subcontractor will conduct and document monthly tests after the initial installation. **All HOT electrical work shall comply with NFPA 70E requirements. Refer to attached 70E forms, Section 4. The permit must be filled out, submitted and reviewed by the BUSD prior to start of work.** Temporary lighting shall not be on the same circuit as temporary receptacles. All electrical boxes containing live wires must have a cover in place.

Tools – Hand and Power

Excess flow safety valves are required on all air compressor outlets **except** for blowpipe cleaning operations that cannot be done with the valve in use. A handle, designed to stop the flow when released, shall be installed on all blowpipes. Pneumatic power tools shall be secured to the hose by a positive means to prevent an accidental disconnect. "Whip check" devices or tie wires are required. Metatarsal foot guards must be worn while using pneumatic tools.

All tools designed to have control handle bars (grinders, drills, etc.) shall have them installed & utilized when the tool is in use. All tools are to be inspected prior to their use. Any tool not in good working condition shall be removed from service. Work stations are to be elevated. This includes chop saws and activities that involve excessive bending to prepare material for installation.

All fuel-powered tools shall be stopped when being re-fueled, serviced, or maintained. A fire extinguisher shall be accessible not closer than 25 feet and no more than 75 feet beyond the refueling area.

Only LOW VELOCITY POWDER ACTUATED FASTENING TOOLS shall be used on this project. Each employee operating a powder-actuated tool shall have, in their possession, proof that they have been trained by the manufacturer, vendor or supplier. Loaded tools shall never be left unattended. Unused or unspent fasteners shall not litter a deck or be left unattended. Unspent shot shall be disposed of per the manufacturers' recommendations. Hearing protection, face protection & signage are required when using this tool. No lead containing shot is permitted onsite.

Excavations

Daily, pre-shift inspection of excavations, the adjacent areas and protective systems shall be made by the competent person for evidence of potential cave-ins, hazardous atmospheres or protective system failure**.** Daily, pre-shift inspection checklists shall be maintained by the subcontractor and submitted to Turner upon request. Excavations greater than 4 feet in depth must be properly sloped, benched or shielded with an access ladder provided. Type C soil cannot be benched. Spoil piles must be at least 2 feet away from the edge of the excavation or trench. The travel distance to the ladder is not to exceed 25 feet.

Barricades, around open holes, trenches, drop-offs, or other identified hazards shall be barricaded 6 foot back from the opening with orange safety fence, (or other equivalent methods). Trench Box tabulated data **s**hall be submitted to Turner Construction Company, prior to use. The bottom trench box must be within 2 feet of the bottom of the trench. The top of the trench box must stick up 18" above the slope or bench. The trench box cannot be moved if workers are in the box.

The excavation contractor shall contact a utility location agency for assistance in locating any underground utilities prior to the start of work. 100% fall prevention is required when working adjacent to excavations greater than 6' in depth. For all excavations 4' in depth and greater, where hazardous material may exist, the atmosphere shall be tested. Examples include landfills, underground fuel storage areas, etc. Any

damaged underground utilities shall be the subcontractor responsibilities covering all cost of repairs. Each contractor will be responsible to have their own current utility ticket and not to ride under another contractor's ticket.

A ground penetration request permit (Form #8) must be utilized when a sub plans to dig more than 6 inches in depth. The Turner superintendent shall sign the permit after a site evaluation.

Demolition

All utilities must be shut off, capped or locked out of service beyond the building line before demolition work is initiated. If the utilities cannot be capped, shut off or locked out, in a select demo operation, a system must be in place to identify what utilities are active or de-energized. Employee entrances to multi-story structures being demolished shall be completely protected by installing a canopy or sidewalk shed that is at least 8 feet out from the building with the walkway at least 2 feet wider than the building entrance/exit.

No material may be dropped to a point outside the building unless that area is delineated with a protective barricade. Debris or material may not free fall more than 20 feet. Chutes must be designed and constructed of such strength as to eliminate failure due to the impact of material and debris loaded into them.

Overhead Protection

At no time will one trade work over/under another unless the activities are coordinated through Turner and precautions as specified in a Job Hazard Analysis are implemented to prevent injury from falling objects. Overhead protection will be provided using designated overhead protected entrances/exits and a minimum of one of the following methods or an equivalent.

- Orange or blue fencing shall be installed on all access levels below open sided exterior and atrium floors to restrict access to the protected entrances/exits. Additionally, debris and materials secured or kept a safe distance from the edge. A line shall be painted 10' inboard from open sided floors edges where it's feasible to delineate "Debris and Material Storage Free Zones."
- Toe boards and/or vertical debris netting (secured at the floor) installed and maintained along open edges below, which employees may walk or work. Shafts with pits will be covered and have overhead protection provided or have guardrails with toe boards and/or be barricaded at the bottom floor to prevent entry. Shafts without pits will have guardrails with toe boards and/or be barricaded at the bottom floor to prevent entry.

Subcontractors shall direct their employees to comply with the access restriction system and use only the overhead protected access points. Subcontractors shall instruct all of its employees as to the markings and methods of overhead protection provisions implemented by Turner and the project subcontractors.

Subcontractor employees shall not remove or by-pass any overhead protective devices unless they have notified Turner and alternative overhead protection provisions have been agreed upon and implemented. Subcontractor is to notify Turner of defects or deficiencies of protective systems before starting to work in an area to avoid being held responsible for corrective actions taken by Turner.

Sidewalk sheds, canopies, catch platforms, and other appropriate fencing shall be provided when it is necessary to safely maintain public pedestrian traffic adjacent to the erection, demolition, or structural alteration of outside walls on any structure. Overhead protection should also be placed at each building entrance where construction workers enter or exit if it is possible that any debris or material could fall from

the building. The cost and burden of supplying this protection is the responsibility of the contractor creating the hazard, unless otherwise stated in the contract.

Respiratory Protection

A respiratory protection program shall be implemented by a trained program administrator. Each contractor must develop and implement a program with site-specific procedures and elements for required respirator use. These elements include; selection of respirators, medical evaluation and monitoring, fit testing, respirator use, care and maintenance, training and record keeping. Voluntary use must be documented properly.

Fire Protection and Prevention

While there are many types of fire extinguishers, 20 lb. ABC dry chemical extinguishers are required on Turner projects. Fire extinguishers shall be inspected monthly and documented appropriately. The inspection date shall be noted on an affixed tag. Travel distance to any extinguisher mounted in the building area shall not exceed 100 feet. Task specific activities may dictate that an extinguisher be provided in the immediate area.

Flammable and Combustible Liquid Storage

Only approved containers are allowed for the storage of flammable or combustible liquids. The sub shall provide & maintain the appropriate fire extinguisher for their flammable and combustible storage areas. An approved container is one which is constructed of metal, has a spring loaded top that allows venting of fumes and contains a flash arresting screen and spout cover. Onsite fuel tanks must be double walled, be protected from construction vehicle traffic & have a built in spill containment system capable of holding all contents of the tank in the event of a leak. Dirt berms & dikes are not permitted. Subs are required to have spill kits.

Liquefied Petroleum Gas (LPG) Use and Storage

LPG gas must never be stored inside a building. LPG gas cannot be used in any building unless authorized by Turner. Concrete barriers or metal posts shall be used when there is a possibility of damage to LPG containers. When propane, etc. heating is used onsite, a fire watch is expected while in use.

Signs, Signals and Barricades

Subcontractors are required to ensure workers fully understand all directional signs posted on the project. Where areas may require additional awareness or present unique danger, the use of warning tape, a physical barrier or equivalent may be necessary. The tape and or signs shall be removed or covered promptly when the hazard no longer exists.

Traffic Work Zone Signaling Requirements

Due to general liability exposure created by improper traffic control, all flagging, training, lane closures, etc., shall conform to the most current edition of the Manual on Uniform Traffic Control Devices (MUTCD). Local permitting issues shall be addressed by Turner prior to the start of work. All workers in the traffic control area must train according to local, state and federal requirements and wear the appropriate reflective vest or high visibility clothing. Stop /slow paddles, not flags, must be used to control traffic flow. Flaggers must be certified in the jurisdiction where the work is being performed. The worker must have the card on their person when flagging.

Material Handling and Storage

Subcontractors will ensure that their material stored inside buildings shall not be placed within 6' of any hoist way or interior floor opening or within 10' of any exterior wall, which does not extend above the stored material. Roofing material should be stored at least 6' away from the edge to prevent displacement. The Turner Superintendent will provide a designated lay down area for the subcontractor's material. At no time shall a worker lift more than 50 pounds without assistance. Mechanical means are to be used when lifting or moving material. .

Steel Erection

A pre-planning meeting must be held and a site-specific erection plan must be developed by the controlling contractor and the steel erection contractor. A pre-planning meeting must also be held to address fall protection during steel removal from "high flat" trailers. All hoisting operations shall be pre-planned so as to minimize the exposure of swinging loads over employees. Routes for suspended loads shall be pre-planned to ensure that no employee is required to work directly under a suspended load, except those involved in steel erection. Employees connecting horizontal members shall not use the members as an anchorage point unless they have been secured at two points independent of an active hoist line (i.e. they shall not walk out onto a member that is only connected on one side and is still attached to the crane).

Multiple lift rigging "Christmas treeing" is only allowed if the following criteria are met;

- a multiple lift rigging assembly shall be used and
- All employees participating in the activity have been trained in the procedures noted in OSHA 29 CFR 1926.761.

A maximum of (3) three members (only beams and similar structural members) may be hoisted per lift. Materials other than structural steel members may not be multiple lift rigged and lifted.

A variance may be approved by The Business Unit Safety Director to allow for (5) five members if a site specific erection plan are approved and a preplanning meeting is completed.

Each employee engaged in a steel erection activity that is on a walking working surface with an unprotected side or edge 6' or more above a lower level shall be protected from fall hazards by safety net systems, guardrail systems or personal fall arrest systems. This includes connectors and any employee installing metal decking.

Cranes, Hoists and Elevators

No crane shall be placed in service on a Turner job until an annual, third party inspection and supplemental repair reports are submitted to Turner indicating the crane meets the manufacturer's inspection criteria. If the manufacturer's inspection criterion does not exist, a structural engineer, familiar with crane design and dynamics, may develop or use existing inspection criteria. Initial inspections must be conducted after final set up on site. The inspection, Standard Form #2 A for Off Road Heavy Equipment, Standard Form #2 B for Cranes, and Tower Crane Rental Equipment Information Checklist must be completed and submitted to Turner prior to use. The crane shall be inspected daily & documentation provided to Turner upon request.

Any crane that is altered, "jumped" or modified in a similar manner onsite must be re-inspected by an independent third party inspection company to ensure proper calibration and function.

Turner requires that all crane operators be certified by an independent testing agency approved by the National Commission for Certification of Crane Operators (NCCCO). Copies of their certifications shall be submitted to TCCo supervision. In addition, verification of hours operating the specific type of crane must

be submitted to TCCo supervision. Operators must perform any required routine maintenance inspections, log the inspections and submit copies to Turner by the 5th of the month for the previous month.

Tower crane can only be erected, dismantled, jumped, or reconfigured when the Assembly/Disassembly Supervisor is on site supervising the process. The assembly/disassembly must be directed by a person who meets the criteria for both a competent person and a qualified person, or by a competent person who is assisted by one or more qualified persons ("A/D director"). See 1926.1404. Before commencing assembly/disassembly operations, the A/D director must ensure that the crew members understand all of the following:

1. Their tasks,
2. The hazards associated with their tasks,
3. The hazardous positions/locations that they need to avoid.

Employers must hold job safety meetings with the crew involved with the jumping operation, whenever the boom, jib, counter-jib is to be reconfigured, or whenever a tower crane is to be dismantled, and each day that work continues. A specific Job hazard Analysis or Pre-task Plan must be generated and reviewed.

An employer may not permit an individual to provide direction or signal a crane unless the individual is qualified. They are to know and understand the type of signals used. If hand signals are used, the signal person must know and understand the Standard Method for hand signals. The employer must provide the documentation for whichever option is used available (Third party qualified evaluator or Employer's qualified evaluator) at the site while the signal person is employed by the employer. The documentation must specify each type of signaling (*e.g*. hand signals, radio signals, *etc*.) for which the signal person meets the requirements

All cranes must have a functioning “anti-two block” device as specified in ANSI B30.5 for each load hoisting line. This requirement may be waived by the Turner Safety Director for certain cycle duty crane operations such as pile driving and drilling rigs.

Any lift exceeding 75% of the cranes rated capacity or lifts involving two or more cranes shall be considered a critical lift. A critical lift plan must be submitted to Turner for review prior to the lift. A documented, pre-lift meeting shall be held in the field with the crew to discuss, at a minimum, the following; calculation of gross weight load, load chart calculations, radius measurements anticipated during the lift, weather and soil conditions, and overhead high voltage power line clearances. No crane shall operate within 20 feet of any energized line unless they follow 1926.1408 (a) (2).

The use of a crane suspended personnel platform is prohibited on TCCo projects unless the employer can demonstrate that conventional methods to do the work are more hazardous. The BUSD shall be consulted in each case. Riding of the headache ball is prohibited on Turner projects. Mobile crane movement on site shall be in accordance with manufacturer’s recommendations. The swing radius of cranes shall be properly barricaded at all times while working on site.

Controlling Contractor

a. Ensure that ground preparations necessary to meet the requirements. The equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met.

The requirement for the ground to be drained does not apply to marshes/wetlands. "Ground conditions" means the ability of the ground to support the equipment (including slope, compaction, and firmness).

b. Inform the user of the equipment and the operator of the location of hazards beneath the equipment set-up area (such as voids, tanks, utilities) if those hazards are identified in documents (such as site drawings, as-built drawings, and soil analyses) that are in the possession of the controlling entity (whether at the site or off-site) or the hazards are otherwise known to that controlling entity.

c. If the A/D director or the operator determines that ground conditions do not meet the requirements in paragraph (a) of this section, that person's employer must have a discussion with the controlling entity regarding the ground preparations that are needed so that, with the use of suitable supporting materials/devices (if necessary), the requirements in paragraph (a) of this section can be met.

Third Party Crane Inspections

Third party crane inspection agencies must be independent to the owner/erector and qualified to conduct inspections in accordance with OSHA 1926.550 and 1910.180, PCSA #2, ANSI/ASME B30.5 (1968)

All cranes on Turner projects will have an annual inspection certification which must be submitted to Turner prior to any site crane operation. The crane operator's manual and load chart must also be kept in the cab during all operations.

Deficiencies found during inspections must be corrected before operation and the appropriate documentation to that fact shall be provided to Turner.

Third party crane inspections will be required when one of the following events has occurred:

1. After site erection and before use of any mobile or stationary crane. This would include boom/jib installation or any other crane part that might be assembled at the project site. Cranes that need no site assembly would not be required to have the third party inspection.
2. When any significant modification or repair of structural members or hoist rope repair and or replacement.
3. After contact with electrical current or any other incident that may have caused potential operational damage.
4. After the crane was shock loaded

Any and all fees associated with crane inspections shall be paid by the company who owns or has rented the crane.

Outrigger on Cranes: Cribbing should be at least 3 times the diameter of the crane pad. The outrigger pads are to be pre-manufactured. Weight of the load must be determined prior to lifting the load.

Rigging Equipment – Selection, Use and Inspection

A pre-planning meeting must be held prior to any lifting activity. All rigging equipment must be inspected prior to use by the qualified rigger. Defective rigging equipment shall be removed immediately from service. Tag lines must be used to control loads.

Individuals who rig loads must be qualified. An employer may not permit an individual to rig loads to be lifted by a crane unless the individual has received training and also has experience appropriate to their level of work. All riggers must be documented as competent persons.

The employer must ensure that each time a critical lift takes place that a certified rigger is on the site and engaged in the process, including the inspection by the qualified rigger of the rigging.

Attachments, including, but not limited to hooks, rings, shackles, oblong links, pear-shaped links or other welded or mechanical links, must have a rated capacity at least equal to the lifting chain, nylon sling or wire rope. Chains cannot be used for overhead lifting, unless it is a specialty chain. Specialty lifting chains must have a permanently affixed, durable identification tag stating size, grade, rated capacity and sling manufacturer. Only Grade 8 or better is permitted. Inspections shall in no event be at intervals greater than once every 12 months with documentation provided to Turner when requested.

Motor Vehicles and Mechanized Equipment

All motor vehicles and material handling equipment, with an obstructed view to the rear, shall have a reverse signal alarm audible above the surrounding noise. A "flagger" or "spotter" may be used in lieu of an alarm. Daily, pre-shift inspection checklists of the equipment shall be maintained by the subcontractor and submitted to Turner upon request. Cell phones and radios shall not be used while operating machinery. No one shall work within 20 feet of motorized equipment such as an excavator, back hoe, front end loader unless that person's presence is fundamental to the operation under way and the operator can observe the person at all times. The use of cell phones is prohibited while the machine or vehicle is in motion.

Combustion powered tools/equipment must not be utilized inside structures unless an evaluation has been conducted to ensure fumes will not affect personnel

A seatbelt must be provided and used when operating equipment. Equipment without a rollover protective structure (ROPS) or seatbelts is not allowed on any Turner project. Submit training records or certification card for all forklift operators prior to operating equipment on the project upon request. The forks on a forklift cannot be used for free rigging. Pick-Up Trucks: No riding will be permitted in the back bed of a pickup truck.

Welding and Cutting

A 20 lb. ABC dry chemical extinguisher shall be immediately available in the work area and shall be maintained in a state of readiness for instant use. Appropriate permit procedures, shields and blankets shall be used when developing site-specific fire prevention programs. Subcontractor is required to implement a fire watch during all welding activities and for 30-minutes post hot work at a minimum. The anti-flash back devices are to be located in/at the torch head and at the cylinders. All torch carts shall be equipped with a fire rated barrier. Cylinders must be stored upright & secured from tipping at all times. The regulators must be removed from the cylinders when not in use.

Lockout / Tagout Procedures

Subcontractors shall submit their written LOTO program and documented employee training prior to beginning work on site. The program must include scope of training, pre-planning and specific LOTO procedures. All individuals working in or around the hazardous energy shall place their own lock and tag on the disconnect of the energy source. The lock must be a single key lock. At no time will someone be allowed to remove another employee's lock unless it has been cleared through TCCo supervision. **All HOT electrical work shall comply with NFPA 70E requirements. Refer to attached 70E forms, Section 4. The permit must be filled out, submitted and approved prior to start of work.**

Scaffolding

All scaffolds are to be built under the supervision of a competent person. The person's name and their qualifications shall be submitted in writing to Turner prior to the start of work. Daily, pre-shift inspection checklists shall be maintained by the subcontractor and submitted to Turner upon request. A Turner employee must verify that inspections are completed as required by regulatory requirements. Masonry scaffolds shall be netted (safety net or other equivalent material) on scaffold backside where work is being performed to prevent materials from falling from the scaffolding to lower levels. The concrete and masonry contractor must provide at least two covered entrances into each building or structure during perimeter work. They must also cordon off other affected areas of access or egress.

100% fall prevention is required at all heights at or above 6 feet and 4 feet on baker scaffolds. A competent person shall determine if it is feasible to use fall prevention devices while erecting / dismantling a scaffold. Rolling scaffold wheels shall be locked when in use. A horizontal, diagonal brace shall be in place to prevent the scaffold from "wracking". Cross bracing shall not be used as a top or mid rail.

Prior to utilizing any scaffold or fall-protection systems, written documentation must be provided upon request to the safety manager substantiating its compliance with current OSHA regulations and Turner requirements. All mobile scaffolds must have guardrails if at the height of 4 feet or greater. The subcontractor shall utilize an approved scaffolding inspection and tagging system. Subcontractors shall employ a color-coded tagging system for all scaffolding. This tagging program includes the following: Visible tags will be affixed to all scaffolding with color designations as follows:

Red - No access. Green - Access allowed by trade personnel. Personnel on the site will be advised of the color-coded tagging system requirement.

Access to levels shall be provided by stair towers, scaffold stair, or prefabricated stairs, etc...

Ladder-jack and Pump-jack type scaffolds are prohibited.

Aerial and Scissor Lifts

At a minimum, employees shall follow the manufacturer's recommendations for fall prevention when working from a scissors lift. If scissor lifts are equipped with an attachment point provided by the manufacturer for a restraint system, they are to be used. The intent of this protection is to keep workers within the confines of the passive protective system (rails) so the shortest length of lanyard that allows the task to be completed and keep the worker confined to the walking/working surface is required. Note: These attachment points are not designed as fall protection anchorages. Never climb above the work platform. A dedicated spotter is required any time a scissor lift must be moved in an elevated state. The lift shall be inspected daily & documentation provided to Turner upon request. Each worker operating the lift shall have a training card or documented training.

Prior to mobilizing, all Mobile Elevated Work Platforms (MEWP) must be inspected to ensure compliance with Turner requirements. MEWP's (scissor lifts, aerial boom lifts, and knuckle booms) must have dual action controls to be approved for use.

Dual action controls require that there be two separate actions to activate the lift. If a MEWP arrives on site and does not have dual action controls, then it must remain inoperable until a Dual action control is

installed. The dual action control may consist of a button that must be depressed in order for the controls to operate, or a toggle switch that must be activated prior to operating the MEWP controls (The toggle switch must automatically return to the center when released).

Where aerial and scissor lifts are used on concrete slabs, any floor depressions or grade change greater than 2", or unprotected edge shall be barricaded to restrict travel onto that area.

Stairways and Ladders

Where doors open directly on a stairway, a platform shall be provided and the swing of the door shall allow an additional 20" so as not to strike an employee on the platform. Stairways having four or more risers or rising more than 30 inches must have at least one handrail. Handrails that will not be a permanent part of the structure being built shall have a minimum clearance of 3 inches between the handrail and walls, stair rail systems, and other objects.

Turner

Ladders Last Policy

I. Policy Statement

1. **Ladder use on Turner Construction projects will be allowed only when it has been determined that it is unfeasible to use all other options to complete the task.**

2. **If it is determined that a ladder is the only means of performing the job at elevated height, a ladder permit must be submitted prior to starting work. At no time will a ladder be on site without a current permit and safety checklist.**

3. **Use of job built ladders is prohibited on Turner Construction Projects. Temporary stair towers or prefabricated stairs shall be used to access different building levels.**

II. Procedures for identifying and responding to all tasks that require the use of a device that allows work from height:

1. Prior to beginning work, the subcontractor or superintendent (for self-perform work) shall evaluate all tasks that require individuals to work at elevated heights. It is the expectation that these tasks will be performed using methods other than a ladder. Use of lifts and portable scaffold devices shall be the preferred method to perform this type of work.

2. If it is determined that a ladder must be used:

   a. The subcontractor shall complete the Turner Construction Ladder Use Permit and have it reviewed and approved by the Turner Superintendent.

   b. **Workers must maintain three points of contact at all times when working from a ladder. If this cannot be done, worker must tie off at any height.**

   c. When working at a height greater than six (6) feet, 100% fall protection is required. A retractable is the only option in this case.

   d. Prior to starting work each shift, The **Turner Construction Ladder Safety Inspection Checklist** shall be completed affixed to all ladders.

   e. Platform ladders shall be the ladder of choice on Turner Construction projects.

   f. **Prior to using a ladder, the Turner Superintendent will review and approve the Job Hazard Analysis, Pre Task Plan, and Ladder Use Permit.**

5.3 Environmental

Contaminated Spills

Scope and Application

- A Contaminated spill is the introduction of undesirable element or substances into the ground that may or may not impact the environment in a negative way. This can be caused by several sources both past and present. Contamination refers to the impact of these sources in any amount and at any degree below or above permissible levels for health and safety toward the environment or to life. Hazardous means it has elevated above the permissible levels for health and safety toward the environment and life and is regulated under government standards.
- Turner's primary concern is to protect the workers and the environment in the event of an Incidental spill on this project.
- Requirements of Subcontractors
- If a spill occurs at the project, the spill shall be isolated/contained, to prevent contamination of the surrounding area, waterways in use, sewer systems or any other environmental impact.
- The Subcontractor is responsible for all the costs associated with the cleanup and disposal of the contaminated/hazardous materials.
- If a spill occurs, the Safety Data Sheet (SDS) for the chemical will provide the emergency information necessary to address the spill. Also, the emergency cleanup team will need a copy of the SDS in order to begin the cleanup process.
- The Subcontractor shall immediately notify Turner in the event of any spill of a substance.

Training

All Subcontractors shall have the appropriate trained employees assigned to the project that are capable of handling spills. Whenever chemicals are brought on site the safety data sheet shall be reviewed with all personnel exposed to its usage

Recordkeeping

- All Subcontractor records regarding spills shall be copied and given Turner for filing.

Fluorescent Lamps

Scope and Application

In addition to the possibility of cuts from glass fragments, serious injury can result from broken fluorescent tubes due to the release of the small amounts of mercury vapor they contain. Mercury vapor, even in very minute quantities, is poisonous. Persons exposed in close proximity or who are cut shall consult a doctor immediately so they may take necessary precautions.

Special regulations also affect the disposal of fluorescent lamp ballast's that contain PCB's.

Fluorescent Lighting Circuits

Scope and Application

Multi-gang lighting toggle switch boxes (see attachments) are available in standard two, three, four, five, six, seven, and eight gangs. Although it is common on commercial projects to install three or more switches in a single box, it is important to understand how dangerous these boxes are. They are particularly dangerous when used to control 277 volt fluorescent lighting circuits.

In a three gang switch box, when one switch is on a different circuit than the other two, this means that the box contains two different phase (positive) legs and the voltage across these legs (phase to phase) is 480 volts. The misconception is that the lighting system is only 270 volts without giving any thought to the potential that there are 480 volts in the box.

If you notice wires (***b***rown, ***o***range, ***y***ellow or gra***y*** – "boy") in outlet, junction, or pull boxes, you shall not touch or move them, since they may be energized and have the required National Electrical Code colors for a 480 volt system.

Only trained Subcontractor electricians are to work on toggle switches that control 277 volt fluorescent lighting circuits. **All HOT electrical work shall comply with NFPA 70E requirements. Refer to attached 70E forms, Section 4. The permit must be filled out, submitted and approved prior to start of work.**

LEAD

Scope and Application

Lead is a hazardous material and thus is highly regulated to protect people (workers and public) and the environment.

Lead can get into your body as fumes containing lead are formed during the melting or paving process when lead is heated to extreme temperatures, i.e., plumbing, removing paint or soldering.

Dust containing lead is formed during sandblasting, grinding, sanding or cutting processes. Mist containing lead is formed during spray-painting operations which use lead base paints.

It is Turner's intent to never expose workers to the hazards created by improper handling of lead materials. If a Subcontractor shall perform work with lead, the Subcontractor is solely responsible to follow the Federal OSHA standards on lead.

General Requirements:

1. Subcontractors shall not touch, remove, demolish, or in any other manner disturb materials that are suspected to contain lead unless procedures have been approved by the Turner Superintendent.
2. Subcontractor's superintendents will immediately stop work in the affected area and will inform Turner if lead is suspected to be present at a location.

Lead Work

- In the event of work with lead containing materials, follow the OSHA standards on lead.

Asbestos

Scope and Application

Asbestos is a widely used, mineral-based material that is resistant to heat and corrosive chemicals. Typically, asbestos appears as a whitish, fibrous material, which may release fibers that range in texture from coarse to silky; however, airborne fibers that can cause health damage may be too small to see with the naked eye.

The Subcontractors are not required to perform any work involving asbestos or asbestos-like materials. However, if subcontractors suspect the presence of such materials at any work site, they shall immediately inform their supervisor and stop work.

If a Subcontractor is required to work in and/or around asbestos, that Subcontractor is solely responsible to meet all applicable Federal OSHA standards regarding asbestos.

General Requirements:

1. Subcontractors shall not touch, remove, demolish, or in any other manner disturb materials that are suspected to contain asbestos.
2. Subcontractor's superintendents will immediately stop work in the affected area without disturbing it, segregate the area and inform Turner if asbestos is suspected to be present at a location.

Hazard Communication (SDS)

Scope and Application

The OSHA Hazard Communication Standard requires that all employers with employees exposed to hazardous chemicals at their worksite establish a hazard communication program. The regulation is more commonly known as “HazCom” or the “Right to Know Law”. This program shall transmit information to the employees about the hazardous chemicals they are, or may be, exposed to at the site. This is accomplished by labels on containers, Safety Data Sheets (SDS), hazardous chemical jobsite survey and training programs.

Safety Data Sheets (SDS's)

1. Turner’s Project Superintendent with the help of the project staff is responsible for obtaining and maintaining the on-site file of all SDS's supplied by distributors, manufacturers, and subcontractors.

While all SDS's may not be uniform in appearance, they shall convey the same message:

a. Identity of the product,
b. Known acute and chronic health effects,
c. Exposure Limits Threshold Limit Values (TLV's),
d. If the product is a suspected carcinogen,
e. Personal protective equipment to be used,
f. Emergency and First-Aid Procedure,
g. Identification of the party responsible for the SDS,
h. Target organ affected.

2. Turner shall ensure that an SDS is obtained with each shipment of any material on the hazard substance survey list, shall one not be obtained at that time, and they shall follow-up in writing to the parties involved to obtain one within 72 hours of the notification.

A. Container Labeling

1. The Turner Superintendent and/or their designee shall verify that all containers received for use are:

   a. Clearly labeled as to content,
   b. Appropriate warnings noted; and
   c. Names and addresses of the manufacturers listed.

2. A written description of the labeling system used by each subcontractor is required to be submitted, along with alternatives to the original label used. All secondary containers used with small quantities of a given material shall also be properly labeled.
3. Labels may be in writing, pictures, numerical system, or any combination of the above. The message shall be understood as to the nature of the hazard, personal protective equipment needed, parts of the body affected, and emergency procedures to take.

B. Employee Training and Education

1. **The Turner Project Superintendent is responsible for the training of Turner employees with regards to the Hazard Communication policy and program. All Contractors and Sub-contractors are responsible to train their own employees.**
2. Training of all personnel can include, but not limited to:
    a. In-house seminar,
    b. Guest speakers,
    c. Use of visual aides,
    d. On-site updates of new products and materials and other related hazards.
3. Instruction shall include, but not limited to:
    a. How to read and understand the information provided on the SDS's and labels supplied by the subcontractors and suppliers.
    b. An overview of the requirements contained in the Hazard Communication Standard.
    c. Discussion of chemicals included in welding or burning, cement, cleaning solvents, gluing processes, wood dust processes, and other such common items.
4. After attending the training session, each employee will sign a form to verify that they have been properly trained with regards to the Hazard Communication Standard and that they understood the project's policy regarding this standard. The form is to be filed at the jobsite.
5. Training of all new personnel will take place as they are assigned to their respective position.

C. Hazardous Non-Routine Tasks

1. Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their employer about hazardous chemicals to which they may be exposed during such activity. The information shall include, but not limited to:
    a. Specific chemical or process hazards,
    b. Protective/safety measures that the employee will take to prevent exposure,
    c. Measures the project has taken to lessen the hazard including ventilation, respirators, presence of other employees, and emergency procedures.
2. An example of non-routine tasks is confined space entry, i.e. checking the bottom of caissons, entering manholes, etc.

D. Contractor Hazard Communication

1. **All contractors, subcontractors, and sub-subcontractors are solely responsible to abide by the Hazard Communication Standard in regards to the training of their own employee, their**

SDS Recordkeeping, their notification procedures, and any other aspects of the requirement.

2. All contractors, subcontractors, and sub-subcontractors are to supply the Turner Project Superintendent with a written copy of their Hazard Communication Program along with SDS's of any chemical materials brought on to the jobsite.

E. Exchange of SDS's

1. The exchange of SDS's on this project shall take place initially when the subcontractor comes onto the site at regular site safety meetings, and/or at any other designated time by the Turner Project Superintendent.

2. All contractors, subcontractors, and sub-subcontractors are to abide by this exchange and are to immediately inform the Turner Project Superintendent of any new chemical substances brought onto the jobsite.

F. Updating Inventory Listings

1. The updating of chemical inventory lists shall be completed as new SDS's are received. Updated lists shall be exchanged at the regular site safety meeting. A master list shall be kept at the Turner office.

2. All contractors, subcontractors, and sub-subcontractors are to abide by this updating exchange and are to immediately inform Turner Project Superintendent of any new chemical substances brought onto the jobsite.

Turner

Confined Space Entry Procedure

Subcontractor competent person is responsible for identifying any potential confined space and shall initially determine if a permit required confined space exists. A preplanning meeting must be held if a confined space exists and proper procedures followed to unsure worker safety. The Site Safety Manager and/or the BUSD are to be consulted prior to any confined space operation. Confined spaces will be continuously monitored while entrants are in the confined work space.

Subcontractors required to work in confined spaces shall submit their Confined Space Program to Turner for review prior to starting any initial confined space operation. All confined spaces are presumed to be "Permit-Required" Confined Spaces and shall be managed such as, unless proven to be Non-permit confined space. Only trained personnel may work in such spaces. The Confined Space Entry Permit Form # 4 shall be available upon request to Turner. Ensure all confined space entries are made under the supervision of a qualified person.

Scope and Application

According to the National Institute of Occupational Safety and Health (NIOSH) the definition of a confined space is one, which by design has limited openings for entry and exit, and unfavorable natural ventilation, which could contain or produce dangerous air contaminants. On this project we may create many temporary confined spaces by operating in areas prior to the permanent ventilation system being installed. Hazardous confined spaces are divided into three main categories:

1. **Lack of Oxygen:** Normal air is 21% oxygen by volume. Shall the percentage drop to near 17% drowsiness and impaired ability to think clearly occur. Anything below 12% causes unconsciousness.

2. **Combustible or Explosive:** Any contaminant in a confined space creates the possibility of fire or explosion. Heat, static electricity, etc. can cause ignition. Many gases are heavier than air and collect in the bottom of pits, trenches, sewers, and rooms. Not only gases are a problem, dusts too can be explosive. Many operations, particularly cutting and welding, create hazards in confined spaces since the use of any combustible or explosive chemical in a confined space allows the buildup of dust and vapor.

3. **Toxic Atmosphere:** We are all aware of the dangers of toxic substances in storage tanks; the less obvious are the toxic situations you might find in construction. Toxic chemicals can be brought into confined spaces. Welding, cutting, painting, etc. can raise the level of chemicals in a confined space to hazardous levels. We shall recognize that confined space hazards exist in construction and are not a problem confined to storage tanks, silos, etc.

There are two (2) types of confined space:

1. **Non-Permit Confined Space:** Non-permit confined space is defined as any space that:

- Has a limited or restricted means for access and egress.
- Is large enough and configured in such a way that an employee can bodily enter and perform work.
- Is not designed for continuous occupancy.
- Does not pose a health or safety risk as described in permit-required confined space.

Examples include but are not limited to non-energized HVAC equipment, certain trenches and excavations. The "competent person" in charge of the work who is fully familiar with the standards relating to confined space shall evaluate these.

2. **Permit Required Confined Space:** Permit-required confined space is defined to include one or more of the following:

   - Contains or has the potential to contain a hazardous atmosphere.
   - Contains a material that has the potential for engulfing an entrant.
   - Has an internal configuration that could trap or asphyxiate an entrant.
   - Contains any other recognized serious safety or health hazard.

Examples of this type of space include but are not limited to: caissons, tanks, vessels, and underground piping and tunneling.

Requirements:

Subcontractor responsibility:

1. Identify the Confined Space.
2. Coordinate for shut off, lock out and tag out all energy sources and mechanical hazards.
3. Verify ventilation or engineering controls of the confined space.
4. Obtain test results of the atmosphere from the subcontractor.
5. Verify rescue and fall protection requirements are being utilized.
6. Coordinate with the Turner Construction Company project staff all requirements for the confined space operation.
7. Inform the Turner Construction Company Superintendent of the "competent person" designated for the work.
8. Submit their Confined Space Program to the Turner Construction Company Project Superintendent for review.
9. Atmosphere testing at start of work and after a distinctive break (i.e. lunch break).
10. Coordinate for local rescue teams services and confirm they are trained in confined space entry/rescue.
11. Have on site the fall protection, perimeter protection, signage and personal protective equipment necessary for working in a confined space.
12. Mechanical and alternate means to evacuate personnel from the confined space.

Training:

The Subcontractor or his designee prior to performing any duties relating to permit-required confined space shall train entrants, attendants, rescuers and entry supervisors.

Record keeping:

Copies of all Subcontractor atmosphere testing, entry logs, training, and any medical records shall be given to Turner Construction Company for record retention.

Turner

THE TURNER CORPORATION

5.4 Substance Abuse Policy

Located or can be inserted from Section 6

5.5 STANDARD FORMS

1) Site Specific Chemical Inventory List (Form # 1)
2) Equipment Inspection
    a. Ladder Checklist & Ladder Permit (Form #2A)
    b. Off-Road Heavy Equipment (Form # 2B)
    c. Initial Equipment Safety Inspection (Cranes) (Form # 2C)
    d. Crane Critical Lift (Form #2D)
3) Energized Electric Work
    a. Energized Electric Work Permit (Form # 3A)
    b. NFPA 70 E Job Briefing and Planning Check List (Form # 3B)
    c. Work Authorization and Job Safety Analysis (Form # 3C)
4) Confine Space (Form # 4)
5) Injury Log (Form # 5)
6) Job Hazard Analysis (Form #6)
7) Pre-Task Planning (Form #7)
8) Ground Penetration Permit (Form #8)

POSTINGS

Emergency Phone Numbers and Procedures

Emergency Action Site Plan

STANDARD FORM # 1

Hazardous Chemical Inventory List

Contractor Project Start Date

#	April 14, on	Common Name / Chemical Name	Manufacturer	SDS on File
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				

Form 2A

LADDER SAFETY INSPECTION CHECKLIST

Inspector:	**E. Date:**
F. Site Location:	**G. Time:**

Instructions:

1) Complete Permit on flipside first

2) Affix completed inspection tag on all ladders passing inspection

3) Tag defective ladders "Out of Service" and discard if beyond repair

4) Note deficiencies/corrective actions in Comment section

5) Return checklist to Turner Superintendent

Y	N		
☐	☐	1.	Broken, bent or missing steps, rungs, cleats, or rails?
☐	☐	2.	Steps and rungs free of water, grease, oil or other slippery substance?
☐	☐	3.	Free of splits, cracks, rust corrosion and dry rot?
☐	☐	4.	Free of sharp edges, cuts, burrs, etc.?
☐	☐	5.	Loose or bent hinges that can't be fully opened or locked in place?
☐	☐	6.	Stable and completely balanced (not shaking or swaying) with all legs resting firmly on the floor?
☐	☐	7.	Loose, broken or missing extension locks to ensure safe overlap of **extension ladder** sections?
☐	☐	8.	Damaged or worn non-slip bases, safety feet, wheels or casters?
☐	☐	9.	**Cross-over ladders** have railings and non-slip steps?
☐	☐	10.	**Weight capacity** label attached? Type 1A
☐	☐	11.	Other structural defects or operating problems?

Comments:

LADDER PERMIT

Project: _____ Date: _____

Contractor Company: _____

Area(s) Ladder to be used: _____

Ladder Competent Person: _____

Competent Person Contact #:_____

Consider how work may be accomplished at or from the ground-level to minimize elevated work. Ladders are to only be used where no safer means exists to access elevated areas. Consider the use of scaffolds, aerial and scissor lifts, rolling stairs, etc. as safer alternatives. **Note: If three points of contact cannot be maintained, 100% fall protection is required.**

Reason ladder is only option (Note: This must be agreed to and approve by the Turner Superintendent and Safety Manager):

Activity/Task(s) to be performed from ladder:

Type of ladder (check one): __Platform-ladder __Stepladder __Extension __Fixed __Trestle __Other

Ladder weight capacity (300 lbs. min): _____

Ladder Height: _____

Will you be 6' or more above a working surface? **Y/N**

If YES, what specific Fall-Arrest System will you use and what will be your anchor point?(Retractable Device is the only appropriate method of fall protection)

Worker's Name_____ Orientation Sticker #

_____ _____

_____ _____

_____ _____

Permit Reviewer (Turner) Print Date

Turner Building L.I.F.E.
Living Injury Free Everyday

Form # 2 B

Initial Equipment Safety Inspection
Off-Road Heavy Equipment

INITIAL INSPECTION APRIL 14,

TYPE OF EQUIPMENT _____ MAKE/MODEL _____ OWNER ID #

OWNED BY _____ IN USE BY (Co.)

OPERATED BY (Name of Operator) _____ EMPLOYER

OPERATOR CERTIFIED? [ ] YES [ ] NO CERTIFIED BY _____ APRIL 14,

INSPECTED BY (Print Name)_____ (Sign Name)

TITLE _____ EMPLOYER

INSPECTED BY (Print Name)_____ (Sign Name)

TITLE _____ EMPLOYER

Back up alarm is functioning and loud enough for the conditions

		YES	NO	N/A
1	Operator has **reviewed charts & manuals** and understands safe operating practices			
2	Operator does a **Daily Equipment Inspection** at the start of the shift			
3	Equipment is in proper condition for street use (turn signals, brake lights, etc.)			
4	Back up alarm is functioning and loud enough for the conditions			
5	Warning horn is functioning and loud enough for the conditions			
6	There is a charged fire extinguisher in the cab			
7	The Cab Glass is without cracks			
8	Steps and seats are in proper condition			
9	Seat belts are provided and they are used			
10	Riders are not permitted where there are no seats with seat belts			
11	Rollover protection is provided			
12	Overhead protection is provided			
13	Protection from flying debris is provided			
14	Adequate lighting is provided for work in low light/dark conditions			
15	Brakes are functioning properly			
16	Beds of dump trucks are equipped with device for locking body in raised position			
17	Tires/tracks are in good condition			
18	Pulleys, belts, gears, chains, and other nip and shear points are adequately guarded			
19	Fuel tanks are located to prevent spills and overflows from hitting hot parts or electrical equipment			
20	Windshield wipers are in good condition			
21	Exhaust is located/directed so as not to endanger workers or obstruct operator's view			

22	Fueling cans used with the equipment are the approved safety type			

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Form # 2 C

Initial Equipment Safety Inspection: Cranes

INITIAL INSPECTION APRIL 14, _____ ANNUAL INSPECTION REPORT EXPIRES

TYPE OF EQUIPMENT _____ MAKE/MODEL _____ OWNER ID #

OWNED BY _____ IN USE BY (Co.)

OPERATED BY (Name of Operator) _____ EMPLOYER

OPERATOR CERTIFIED? [ ] YES [ ] NO CERTIFIED BY _____ APRIL 14,

INSPECTED BY (Print Name)_____ (Sign Name)

TITLE _____ EMPLOYER

INSPECTED BY (Print Name)_____ (Sign Name)

TITLE _____ EMPLOYER

*Indicates must be verified by and/or submitted to the Turner Safety Manager/Engineer
Items (except #20) marked "NO" must be corrected prior to operation of crane

		YES	NO	N/A
1*	Current "**Annual**" **Inspection Report** w/any deficiencies noted as corrected			
2	**Operator's Manual**			
3*	Daily Operator's Inspections done with **Inspection Log** up to date			
4	**Load Charts**			
5*	Chart for hoisting "**over the front**"			
6	**Signal Chart** posted			
7	Operator has **reviewed charts & manuals** and understands capacities and limitations			
8	Functioning "**Anti-Two-Block**" **Device** as per ANSI B30.5			
9	**Boom Angle Indicator**			
10	**Leveling Device**			
11	**Operator Controls** legibly marked as to function			
12	FAA **Light** and/or **Flag**			
13	**Cab Glass** intact			
14	Functioning **Warning Horn**			
15	Charged **Fire Extinguisher**			
16	Adequate **Blocking** (min. sq. ft. each float = rated capacity of crane / 5)			
17	**Floats positively attached** to outrigger rams			
18	Block and/or ball have **Capacity Plates** and hooks have **Safety Latches**			
19	**Wedge Socket** termination is proper & not clipped directly to load line			
20	Will or might be **Hoisting Personnel**			

CRITICAL LIFT DOCUMENT FORM

Page 1 of _____ **(Form # 2D)**

COMPANY: _____ **DATE:_____**

Critical Lift Check List April 14, of Planned Lift(s): _____ Time of Planned Lift(s): _____

1 Designated Positions

a. Supervisor Responsible for Lift: _____

Qualifications_____

b. Designated Crane Operator: _____

Qualifications: _____

c. Designated Riggers:_____

Qualifications: _____

2 Description of item to be hoisted:

a. Descriptions of item (s) to be hoisted:

_____

b. Weight(s) of item(s) to be hoisted:

_____

c. Estimate weight(s) of item(s): _____

Estimated by Whom: _____

d. Item(s) weight verified: _____

Confirmed by Whom: _____

e. Dimensions of item(s) to be hoisted:

L. _____ W. _____ H. _____

3 Hoisting equipment to be used:

a. Crane: (Make) _____ (Model)_____ Gross Lifting Capacity: _____

b. Headache ball weight: _____

Verified By: _____

c. Spreader beam(s) weight: _____ Capacity: _____

Verified By: _____

d. Shackle(s) size: _____ Capacity: _____

Verified By: _____

e. Nylon Sling size: _____ Capacity: _____

Verified By: _____

f. Chain Sling size: _____Capacity: _____

Verified By: _____

g. Kevlar Belt size: _____ Capacity: _____

Verified By: _____

h. Other:

4 Lift Geometry: See Attached

a. Crane Position:

_____

b. Height of Lift:

_____

c. Load Radius:

_____

d. Boom Length:

_____

e. Boom Angle:

_____

f. Maximum Load Limits for Range of Lift:

_____

5 Environmental Conditions:

a. Weather: _____ Temp: _____ Wind: _____

b. Type of ground crane will be set up on, asphalt, Concrete, Dirt:
_____

c. Mats required: _____ How many: _____

d. Outriggers Required: _____ Crawler Track: _____

e. Communication source: Two way radios/ Hand Signals

f. Day work: Y or N Night Work: Y or N If yes, type of lighting required:

g. All lifting operations shall cease if the following conditions occur:
LIGHTNING, ICING AND OR WIND SPEEDS IN EXCESS OF 25 MPH

6 Rigging Procedures:

a. Lifting Points: _____ Factory installed: _____ Field installed: _____

b. Spreader beam required: Y or N If yes, what size: _____

c. Sketch of piece lifted and rigging: See Attached

REMARKS & COMMENTS:

The following items must be presented to Turner Construction Company prior to the start of any crane lift:

a. Certificate of Insurance for outside crane rental service.

b. Copy of current annual crane inspection certificate.

c. Copy of operators Certification.

Approved and Accepted By:

_____

Lift Geometry

Sketch of piece lifted and rigging:

Crane position & location.

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(Form # 3A)

ENERGIZED ELECTRIC WORK PERMIT

Part I: TO BE COMPLETED BY THE REQUESTER

1) Detailed job description procedure to be used in performing the above described work:

2) Description of the Safe Work Practices to be employed:

3) Justification of why the circuit/equipment cannot be de-energized or the work deferred until the next scheduled outage:

Requester/Title _____ Date _____

PART II: TO BE COMPLETED BY THE ELECTRICALLY QUALIFIED PERSONS DOING THE WORK:

1) Detailed job description procedures to be used in performing the above description work:

2) Description of the Safe Work Practices to be employed:

3) Results of the Shock Hazard Analysis:

4) Determination of Shock Protection Boundaries:

5) Results of the Flash Hazard Analysis:

6) Determination of the Flash protection Boundary:

7) Necessary personal protective equipment to safely perform the assigned task:

8) Means employed to restrict the access of unqualified persons from the work area:

9) Evidence of completion of a Job Briefing including discussion of any job-specific hazards:

10) Do you agree the above described work can be done safely? Yes No (If no, return to requester)

Electrically Qualified Person(s) _____ Date _____

PART III: APPROVAL(s) TO PERFORM THE WORK WHILE ELECTRICALLY ENERGIZED:

Project Executive _____ Project Safety Manager _____

Project Manager _____ BU Safety Director _____

Project Superintendent _____ Date _____

(Form # 3B)

NFPA 70E: Job Briefing and Planning Checklist

Identify

What are the hazards?

What voltage levels are involved?

What skills are required?

"Foreign" voltage source present?

Notes:

Potential for arc flash

Unusual work conditions

Is this a multiple -person project?

Ask

Can the equipment be de-energized? Y or N

Are there possible back feeds of the circuits to be worked on?

Notes:

Is a "standby person" required?

Check

Job Plans

One Lines and vendor prints

Status Board

Individuals familiar with facility?

Notes:

Safety procedures

Vendor information

For up-to-April 14, information on system and resources.

Know

What is the Job?
Communicate!

Who is in charge?

Notes:

Who else needs to know?

Think

The extra event ….What if?

Lock - Tag - Test - Try

Test for voltage first.

Install and remove grounds

Notes:

Us the right tools, equipment and PPE

Install barriers and barricades

What else…?

Prepare for an Emergency

Who is First Aid/CPR Trained?

Telephone location?

Fire alarm locations?

Confined space rescue available if required?

Emergency telephone numbers.

Fire extinguisher

Notes:

Exact work location.

Shut off in case of emergency.

Location of emergency equipment.

Is required emergency equipment available?

Radio communications available?

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Work Authorization and Job Safety Analysis **(Form # 3C)**

for Working on or Near Energized Electrical Circuits

Specific Location: _____

_____

_____

NOTE: All information must be completed before submission

1 Name of Electrical Workers Supervisor: _____

2 Name of Electrical Workers: _____

3 Name of Safety Observer: _____

4 Brief Description of Task to be Performed: _____

_____

5 Description of Voltage and Location of Machine or Equipment: _____

_____

6 Confirmation of Electrical Workers' Training and Qualifications: _____

_____

The employee(s) must have successfully completed formal employer-approved training in the following subjects:

		April 14, Completed
a.	Electrical Safety	
b.	Lockout-Tagout	
c.	CPR	
d.	First Aid	
e.	70E Standards	

7 Identify the protective clothing or equipment required for the job: Note all equipment must have current test and/ or certification.

a. _____ Safety Glasses and/or Face Shield

b. _____ Non-Conductive Hard Hats

c. _____ Certified Rubber Gloves and Leather Protective

d. _____ Insulating Sleeves and Aprons

e. _____ Dielectric Blanket and Insulated Mats

f. _____ Hearing Protection

g. _____ Respiratory Equipment

h. _____ Insulated Tools.

I. _____ Other: Cal rated clothing, etc.

8 Job Safety Analysis Form must be produced by the contractor performing the work.

9 Pre-Task Planning Form must be produced by the contractor performing the work with all employees involved sign.

10 Safety Checklist for Live Electrical Work:

1 Specific work areas must be cordoned to prevent unauthorized access to the live work area.

2 A minimum of two equally qualified workers must be present when the live work is accomplished.

3 An individual certified in First Aid and CPR shall be immediately available to the area.

4 All persons in the work areas should remove all jewelry.

5 If ladder access is required, only fiberglass ladders are authorized. Although wood ladders are non-conductive the wood ladders are non-conductive that can absorb water and become conductive.

6 If access to the live work is in a wet area, place wood planking or it's equivalence on the floor.

7 Work boots for persons performing the live work should be ANSI approved for electrical work.

8 Insulated gloves worn by workers performing the live work must have a current dielectric test date.

9 All work must comply with OSHA 1926(Subpart K, NEC, 70 E standards and applicable NIOSH Polices.

Turner

CONFINED SPACE ENTRY PERMIT

1. LOCATION	START (Hour)	FINISH (Hour)

2. JOB DESCRIPTION

3. TYPE OF SPACE

❑ High-temperature manhole ❑ Electrical/phone manhole ❑ Sanitary manhole ❑ Lift station ❑ Water meter pit

❑ Other (Specify):_____

4. ATMOSPHERIC SAMPLING CONDUCTED BY (Complete 4-6)

NAME (Signature)	TITLE	DATE

ATMOSPHERIC SAMPLING REQUIRED

❑ Prior to ventilation/start of job (always required) ❑ Periodically during occupancy ❑ Continuously during occupancy

ATMOSPHERIC SAMPLING INSTRUMENT MANUFACTURE AND MODEL#	SERIAL NUMBER	DATE OF LATEST CALIBRATION

ATMOSPHERIC SAMPLING REQUIRED

SAMPLE	ACCEPTABLE RANGES		RESULT ❑ AM ❑ PM	RESULT ❑ AM ❑ PM	RESULT ❑ AM ❑ PM	RESULT ❑ AM ❑ PM	RESULT ❑ AM ❑ PM
	MINIMUM	MAXIMUM					
Oxygen	19.50%	23%					
Flammable gas/vapors	0%	10% LEL					
Others (Specify)	0%	10%PPM					
Temperature							

NOTE: 1. If levels are outside the acceptable levels specified above, entry is denied until 3 consecutive test are done 5 minutes apart with or without mechanical ventilation, indicate. 2. If additional space is needed, record sampling results on back.

5. VENTILATION *

❑ No mechanical ventilation required required. ❑ Continuous mechanical ventilation required.

* For high-temperature spaces and/or if any atmospheric data are outside acceptable ranges or if chemical hazards are present, ventilate at least 15 minutes prior to entry.

6. EMERGENCY PERSONNEL STANDBY

❑ Not required ❑ Fire/Rescue Protective Service Notes/Comments:_____

❑ Safety Officer ❑ Other (Specify): _____ _____

7. PROTECTIVE EQUIPMENT REQUIRED

❑ Type "C" supplied-air respirator ❑ Full body coverings

❑ Other respiratory protection (Specify): _____ ❑ Two-way radio

❑ Hearing Protection ❑ Fire extinguisher

❑ Coveralls

Safety harness/lifeline is required if:1 Any sampling data is outside acceptable ranges; 2. Type "C" supplied-air respirator is required; 3. Moderate/high risk of burns or scalds; or 4. During emergency rescue. Harness/lifeline use requires the fire protection services to be notified.

8. ISOLATION OF MECHANICAL , ELECTRICAL, PHYSICAL, OR CHEMICAL ENERGY SOURCES REQUIRED?

❑ No ❑ Yes (Specify): _____

9. HAS SPACE CONTAINED LIQUIDS. GASES OR SOLIDS OF TOXIC, CORROSIVE OR IRRITANT NATURE?

❑ No ❑ Yes If Yes, contact the Job Supervisor and the Risk Management Branch prior to entry.

10. NAME OF ATTENDANT (Must maintain visual/voice contact with personal in space.)

11. NAME(S) OF EMPLOYEE(S) AUTHORIZED TO ENTER

12. SPECIAL INSTRUCTIONS/EQUIPMENT

The job described above has been reviewed and it is agreed that it will be accomplished in accordance with requirements specified herein.

QUALIFIED PERSON (Print and Sign) DATE

EMERGENCIES

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TURNER CONSTRUCTION COMPANY
FALL PROTECTION CHECKLIST

Project Name: Project #

Subcontractor Name:

Date:

Performed By:

Fall Protection Options for Hazardous Exposures	Look At:	Satisfactory	Unsatisfactory	Non-Applicable	Comments
Working Over Dangerous Equipment: guard rail—	**Guard Rails:**				
Safety net—personal fall arrest system	Top Rail @ 42"….Max 3" deflection……Mid Rail @ 21"….Will withstand 200 Lbs. Force				
Excavations: Guard rails – Fences – Barricades	in any direction…Toe boards required…Wire rope flagged every 6' with high visible tape				
Floor/Roof Openings: Hole covers – guard rails –	**Vertical Lifelines:**				
Personal fall arrest – fall restraint	Free from knots……Anchor to support 5000 lbs.				
Formwork & Re-steel:	Independently secured to structure…Line and rope grab inspected daily for wear &				
Personal fall arrest system – positioning system	deformities…Breaking strength of 6000 lbs……One worker per lifeline				
Hoist Areas: Guard rails	**Tie Off:**				
Personal fall arrest system – fall restraint system	Mandatory Tie off at 6' or above…No one ties off to wire rope or wood….				
Leading Edge: Guard rails	Harness (ABC) Anchorage, body-wear				
Personal fall arrest system – Fall restraint	Connection used under direction of qualified person…Employees must wear approved				
Over-head Work: Guard rails-safety net-Personal fall arrest system-controlled access zone used only to protect worker below from "struck by" incidents	and Inspected equipment…"D" ring located between shoulder blades….Leg straps intact…				
	No exposure to fall greater than 6' when including lanyard, tie off point expansion, body height,				

Pre-cast Concrete Erection: Guard rails—safety net —	deployment of shock absorber,/and or length of retractable grab point…Lanyard with double				
Personal fall arrest system	locking snap hook, readable mfg's tag, no wear and tear, no ripped stitching…				
Roof Work: Guard rails —safety net —	Is plan in place for recovering an individual who falls?…Self Retracting Lanyards: Inspected daily…				
Personal fall arrest system— fall restraint system—	After fall or misuse, must be inspected by manufacturer and reset with applicable paperwork supplied				
	Holes/Openings:				
Unprotected Sides and Edges: Guard rails— safety net	Coverings secured both vertically and horizontally….required for all openings including				
Personal fall arrest system— fall restraint system	skylights and roof openings…capable of supporting 2 X intended weight				
Ramps, Runways, Walkways: Guard rails—	(workers, lifts, vehicles, etc.)….Must be ¾" plywood minimum or guardrail				
Personal fall arrest system— safety net	**Ladders:**				
Wall Openings: Guard rails— safety net —	Base level & free from debris…….No one stands on top 2 steps….				
Personal fall arrest system - fall restraint system	To be provided at points of access 19"….Inspected by competent person….				
Scaffolds: Guard rails— personal fall arrest system	Non – conductive…….slip resistant…Job made – cleats 10" to 14" apart and uniform……				
(If above guardrail system)	4 to 1 lean. Work facing ladder				

Steel Erection: Guard rails—safety net –	**Scaffolding:**				
Personal fall arrest system - fall restraint system	Set-up: Bases, cross bracing, guard rails, toe boards, mid rails, level,				
Metal Decking: Guard rails — safety net –	fully planked with scaffold grade planks…Protected from tipping…Fall protection				
Personal fall arrest system - fall restraint system	required for erection…Fall protection required at 6' or above…Debris removed daily….				
Siding Erection: Guard rails - safety net - personal fall	Access provided by "hook –on" ladder, stair tower, ramps, walkways, scaffold stair……				
Arrest system	Never overloaded……Inspected and tag signed off daily by competent person….				
Glazing & curtain wall: Guard rails - safety net - personal	Material secure and falling object protection with toe boards, catch platforms,				
Fall arrest system – fall restraint	canopy structures…Front edge of platform no more than 14" from face……				
Swing stages: Guard rails - safety net - personal	Training required on each type of scaffold worked on				
Fall arrest system – fall restraint	**Safety Nets:**				
Bosun's chair: Personal fall arrest – fall restraint	Designed by a professional for each application…Inspected weekly or after an occurrence…				
Snorkel Lift: Guard rails – personal fall arrest	Inspection documented…Material removed ASAP….Installed not more than 30'				
General Questions:	from work area…Mesh size no bigger than 6" X 6"				
	Safety Monitor System:				
Are workers empowered to identify hazards and stop work?	Turner does NOT recognize a Safety Monitor System under any conditions or circumstances.				
Are competent persons designated and on site?	**Suspended Scaffold:**				
Is Turner taking disciplinary action on fall protection Offenses?	Independent lifelines…Competent person checks connections, anchorage points, and inspects scaffold…….				
Are Bi-lingual provisions in place & being used?	Counter weights secured by mechanical means (no sand bags, masonry units, gravel, rolls of roof felt)…….				
Have all workers completed orientation?	Suspension ropes inspected by competent person prior to each shift				

Have Vendors provided Fall Protection Training?	**Aerial Lifts:**				
	Tie off required inside boom lift platform per OSHA & Manufacturer's instructions……				
	Stand firmly in basket…….				
	Inspected by competent person prior to each shift				
	Concrete Work:				
	100% tie off at 6' or above……..Approval for using positioning systems on formwork……..				
	impalement hazards covered				
	Steel Erection, Welding, Bolting, Metal Decking				
	100% tie off at 6' or above…….Erection to minimize connectors coming into				
	contact with swinging members…….Use lifts to connect……Use tag lines……				
	Protection system in place when lifting deck.				

Additional Comments:

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Injury Log

Standard Form # 5

CONTRACTOR _____ PROJECT

MONTH & YEAR _____ F/A=FIRST AID M/O=MEDICAL ONLY L/T=LOST TIME R/T=REFUSED TREATMENT D/T=DRUG TEST

No	Date	Time	Name of Injured	Employer	Trade	Supervisor	Description of Injury	Type of Treatment	F/A	M/O	L/T	R/T	D/T

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JHA (Job Hazard Analysis)

Standard Form #6

Project: _____ Date: _____ Contractor: _____ Page ___ of ___

Description of Work: _____ JSA#_____

_____ Prepared By_____

Safety and Health Considerations – Circle Yes or No

Falls From Elevation:	**Yes**	**No**	**Underground Utilities:**	**Yes**	**No**	**Energized Systems/LOTO:**	**Yes**	**No**
Confined Space(s):	**Yes**	**No**	**Line Breaking:**	**Yes**	**No**	**Health Hazards:**	**Yes**	**No**
Respiratory Protection:	**Yes**	**No**	**High Voltage Work:**	**Yes**	**No**	**Scaffolding/Arial Lifts:**	**Yes**	**No**
Excavating/Trenching:	**Yes**	**No**	**Work Permits**	**Yes**	**No**	**Asbestos and/or Lead:**	**Yes**	**No**
Public Exposure:	**Yes**	**No**	**MEP Issues:**	**Yes**	**No**	**Hazardous Materials/Waste:**	**Yes**	**No**
Hot Work:	**Yes**	**No**	**Cranes/Rigging:**	**Yes**	**No**	**Working Over Water:**	**Yes**	**No**

Description of Steps to be Performed	Hazards Associated with Each Step	Required to Eliminate or Control the Hazard

JHA (Con't)		
Description of Steps to be Performed	**Hazards Associated with Each Step**	**Required to Eliminate or Control the Hazard**

Review Signatures and Date

Originator	Date
Contractor Superintendent/Engineer	Date
Contractor Superintendent/Engineer	Date

INSTRUCTIONS FOR COMPLETING THE JOB HAZARD ANALYSIS FORM

Job hazard analysis (JHA) is an important accident prevention tool that works by finding hazards and eliminating or minimizing them before the job is performed, and before they have a chance to become accidents. Use JHA for job clarification and hazard awareness, as a guide in new employee training, for periodic contacts and for retraining of senior employees, as a refresher on jobs which run infrequently, as an accident investigation tool, and for informing employees of specific job hazards and protective measures.

Set priorities for doing JHA's: jobs that have a history of many accidents, jobs that have produced disabling injuries, jobs with high potential for disabling injury or death, and new jobs with no accident history.

Select a job to be analyzed. Before filling out this form, consider the following: The purpose of the job--What has to be done? Who has to do it? The activities involved--How is it done?

In summary, to complete this for you should consider the purpose of the job, the activities it involves, and the hazards it presents. If you are not familiar with a particular job or operation, interview an employee who is. In addition, observing an employee performing the job or "walking through" the operation step by step may give additional insight into potential hazards. You may also wish to videotape the job and analyze it.
Here's how to do each of the three parts of a Job Hazard Analysis:

Description of Steps To Be Performed	Hazards Associated With Each Step	Required to Eliminate or Control the Hazard
Examining a specific job by breaking it down into a series of steps or tasks, will enable you to discover potential hazards employees may encounter. Each job or operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity or change in direction or movement. Picking up the box from the conveyor and placing it on a hand truck is one step. The next step might be to push the loaded hand truck to the storage area (a change in activity). Moving the boxes from the truck and placing them on the shelf is another step. The final step might be returning the hand truck to the receiving area. Be sure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the casters on the hand truck. However, if that step is generally part of the job , it should be listed.	A hazard is a potential danger. The purpose of the Job Hazard Analysis is to identify ALL hazards, both those produced by the environment or conditions and those connected with the job procedure. To identify hazards, ask yourself these questions about each step: Is there a danger of the employee striking against, being struck by, or otherwise making injurious contact with an object? Can the employee be caught in, by, or between objects? Is there potential for slipping, tripping, or falling? Could the employee suffer strains from pushing, pulling, lifting, bending, or twisting? Is the environment hazardous to safety and/or health (e.g. toxic gas, vapor, mist, fumes, dust, heat, or radiation)? Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards -- the actions, conditions, and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents.	Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury, or occupational illness. Begin by trying to: 1) engineer the hazard out; 2) provide guards, safety devices, etc.; 3) provide personal protective equipment; 4) provide job instruction training; 5) maintain good housekeeping; 6) insure good ergonomics (positioning the person in relation to the machine or other elements in such a way as to improve safety). List the recommended safe operating procedures. Begin with an action word. Say exactly what needs to be done to correct the hazard, such as, "lift using your leg muscles". Avoid general statements, such as, "be careful". List the required or recommended personal protective equipment necessary to perform each step of the job. Give a recommended action or procedure for each hazard. Serious hazards should be corrected immediately. The JHA should then be changed to reflect the new conditions. Finally, review your input on all three columns for accuracy and completeness. Determine if the recommended actions or procedures have been put in place. Reevaluate the job hazard analysis as necessary.

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PTP (Pre-Task Planning)

Standard Form #7

Project: _____ Date: _____ Contractor: _____ Page ___ of ___

Description of Work: _____

Supervisor: _____ Location of Task: _____

Evaluating Your Work Area – Circle Yes or No

Has the competent person performed req'd inspections?	**Yes**	**No**	**Competent Person Name** _____		
Are you working around line systems?	**Yes**	**No**	**Do you have the required PPE needed for this task?**	**Yes**	**No**
Does this task require special training?	**Yes**	**No**	**Are the required materials and tools provided?**	**Yes**	**No**
Is an SDS review necessary for this task?	**Yes**	**No**	**Have all tools/equipment been inspected before use?**	**Yes**	**No**
Is air monitoring required?	**Yes**	**No**	**Does this task involve a confined space?**	**Yes**	**No**
Are work permits required for this task?	**Yes**	**No**	**Should the Safety Dept. be involved in this planning?**	**Yes**	**No**
Are you familiar with Excavation routes?	**Yes**	**No**	**Is there a safety issue that has not been addressed?**	**Yes**	**No**

Has emergency equipment such as fire extinguishers, eyewash stations, safety showers and phones been located? **Yes** **No**

If the work area is congested, has the work plan been coordinated with other crafts? **Yes** **No**

Potential Hazard Checklist (place a checkmark if applicable)

___ Caught In/Between	___Hazardous Chemicals	**List PPE Required:**
___ Thermal Burns	___ Heat Exhaustion/Stress	
___ Particles in Eyes	___ Sharp Objects or Tools	_____
___Elevated Work	___ Radiations	_____
___ Poor Housekeeping	___ Excavations	_____
___ Electrical Shock	___ Lockout/Tagout	_____
___ Chemical Burns	___ Ladders	_____
___ Fire/Explosion	___ Rigging	_____
___ Inadequate Access	___ Falls from Elevations	
___ High Noise Levels	___ Confined Spaces	
___ Struck By	___ Line Breaking	
___ Manual Lifting	___ Inhalation Hazard	
___ Chemical Spill	___ Critical Lift	
___ Plant Operations	___ Compressed Gases	
___ Scaffolding	___ _____	
___ Mobile Equipment	___ _____	

Description of Steps to be Performed	Hazards Associated with Each Step	Required to Eliminate or Control the Hazard

PTP (Con't)		
Description of Steps to be Performed	**Hazards Associated with Each Step**	**Required to Eliminate or Control the Hazard**

Work Crew Sign-Off (Signature)

GROUND PENETRATION REQUEST PERMIT

Ground Penetration Request Permit

This request form must be completed and authorized prior to penetrating the ground greater than 6 inches anywhere on site. The contractor disturbing soil is required to contact the locater and review as-builts. J.H.A. **MUST** be submitted prior to commencing all ground-penetrating activities on site. And prior to the start of the work in the field, the supervisor will conduct a Pre-Task Planning meeting with the crew performing the work.

Date: _____

Contractor requesting excavation / surface penetration: _____

1. Name of Superintendent / Foreman _____ Phone_____

Anticipated Dates of Work: _____

Anticipated Hours of Work: _____

Remarks / Clarifications (as necessary)_____

Location of excavation or surface penetration: _____(attach plan)

Description of Work: _____

_____

Means of disturbing soil *(check one):*

Excavator/Heavy Equip___ Backhoe ___ Pneumatic Driver (fence posts) ___ Drilling/Auger___

Motorized Saw___ Hand Removal (Shovel) ___ Other: _____

Contractor's Proposed Method of Identifying Known Utilities (Circle One)

6. Vacuum Excavating Yes No
7. Ground Penetrating Radar Yes No
8. Hand Excavation Yes No
9. Other Explain :_____
10. Were all known utilities identified? Yes No

    If no, which known utilities were not identified and why?

    _____

    _____

Layout of Proposed or New Work (Circle One)

2. Has the Contractor clearly identified the line of the proposed excavation Yes No

Utility Locate Organizations:

2. Identify organizations that have completed utility locates.

    _____ _____ (date / permit)

    _____ _____ (date / permit)

    _____ _____ (date / permit)

Approved Private Locator Company Name: _____

Method of Locating: _____

GROUND PENETRATION REQUEST PERMIT

Identified Utilities:
Have all known Utilities around the facility been physically located on the ground as applicable? Identify point of origin and point of termination of each line.

i.	Power	N/A	Yes	No
j.	Control	N/A	Yes	No
k.	Grounding	N/A	Yes	No
l.	Comm / Data	N/A	Yes	No
m.	Water	N/A	Yes	No
n.	Sewer	N/A	Yes	No
o.	Gas	N/A	Yes	No
p.	Other	N/A	Yes	No

Utility Delineation:
Has a ten foot utility channel "five feet on either side of the known utilities" been marked or delineated with snow fence, orange silt fence or the equivalent where the new work crosses the utility to ensure adequate recognition?
Yes No

As Built Reviewed? *(Circle One)* Yes No Date of Drawings/Docs: _____

Documented Safety Preplanning Meeting: Yes No

Are any overhead lines in the area? *(Circle one):* Yes No If yes, they **MUST** be marked at ground level with signage.

Have the areas beneath the concrete slabs been X-rayed prior to any saw cutting or removal? (Circle One) Yes No

Competent Equip Oper. (*Print)*:_____ Foreman *(Print)*:_____

Spotter Required? *(Circle One)* Yes No

Are there existing utilities in the area described in this request? Yes_____ No _____

IF YES, the areas to be excavated are clearly marked-out and utilities within or near the proposed excavation will be "pot-holed" every 15 feet at a minimum using a vacuum process and protected through backfill operations. If multiple known existing utilities are within or near the proposed excavation, increased potholing will be required as determined on the JHA. Unknown existing utilities may be in the area of the work and excavation shall be done with due diligence, strict adherence to the Job Hazard Analysis (JHA), and awareness to prevent damage to unknown utilities.

CERTIFICATION:

By signing below, I understand that falsifying any part of this request will lead to my immediate dismissal from this project and that my employer will be responsible for any damages incurred as a result of my negligence. I certify that all records of existing utilities in the described area, including but not limited to As-Builts, Mark-Out and Underground Utility Coordination Reports have been examined and ALL KNOWN UTILITIES HAVE BEEN IDENTIFIED AND WILL BE PROTECTED FROM DAMAGE. Employees not aggressively identifying and protecting utilities will be removed from the project.

Subcontractor Superintendent/Foreman: _____
Turner Superintendent: _____

POST IN ALL TRAILERS BY PHONE(S)

Crisis Management/Emergency Action Site Plan

TURNER CONSTRUCTION COMPANY Project _____

EMERGENCY PHONE NUMBERS

TURNER OFFICE..... -
FIRE/AMBULANCE.....911
POLICE/SECURITY.....911

EMERGENCY PROCEDURE: **NON-EMERGENCY POLICE**

1) **Radio or call the TURNER Field Office and/or Call Emergency Services. (ES)**
2) **Clearly indicate that you are calling from the TURNER Construction Project at _____.**
3) **Give a detailed description of the incident and extent of damage or injury.**
4) **Specify the incident location by area and/or building as indicated on the Emergency Action Site Plan and indicate the best access way.**
5) **Give call back number and/or maintain communication for questions or instructions.**
6) **Direct TWO people to meet the emergency vehicles at the site entrance. Escort ES to the scene of the incident.**
7) **Call TURNER and notify of incident.**
8) **If an evacuation of the site is necessary, notification will be given by radio, word of mouth and/or a continuous horn blast.**

Crisis Management/Emergency Action Site Plan

PROJECT _____

Turner

Section

6

TURNER RISK MANAGEMENT

CORPORATE ENVIRONMENTAL,

HEALTH AND SAFETY POLICY

Substance Abuse Policy

Turner

THE TURNER CORPORATION

Substance Abuse Policy

Table of Contents

Definitions

- **Adulterated Specimen** – A specimen that contains a substance that is not expected to be present in human urine, or contains a substance expected to be present, but which is at a concentration so high that it is not consistent with human urine, which will obstruct the testing process or results. This type of specimen with a Verified Test Result shall be considered as a Refusal to Test, which is treated the same way as a Positive Test Result.

- **Accident/Incident** – A work-related event which results in personal injury to a Turner Employee or Other Worker or to any other person, damage to property or the workplace, or which could have resulted in personal injury or damage to property or the workplace. An Accident/Incident includes, but is not limited to, any Accident/Incident on Turner Property or at a Turner Facility which results in:
    a) A fatality;
    b) Bodily injury requiring a visit to any medical provider;
    c) Vehicular and/or equipment damage in apparent excess of $1,000;
    d) Non-vehicle property damage in apparent excess 1,000; or
    e) Any work-related event that could have resulted in any of the above.

- **Alterative Program-** An Alternative Program is a substance abuse program administered by an entity other than Turner under procedures equal to or more stringent than this Policy and which has been approved and accepted by Turner, in Turner's sole discretion, as an alternative or reciprocal substance abuse testing program.

- **Alternative Program Administrator –** The individual responsible for drug and alcohol testing and related procedures for all Turner Employees and/or Other Workers covered under an Alternative Program.

- **Annual Screen** – A drug screen which Turner may require of any Turner Employee or Other Worker on a yearly basis in addition to any other screen that was given in the previous twelve month period, subject to requirements and limitations of a collective bargaining agreement, when applicable, but only to the extent of a conflict therein with performing an Annual Screen.

- **Chain of Custody –** The protocol followed when submitting specimens for drug and alcohol testing. This protocol assures that there is no opportunity for contamination or switching of samples. Elements include signed and witnessed forms, sealed and initialed containers, and couriers requiring a receipt.

- **Collection Site** – A place where individuals provide specimens to be analyzed for the presence of alcohol or drugs. This site may or may not be owned and/or operated by the laboratory that actually analyzes the specimen.

- **Confirmatory Test** – When testing for drugs, this is the second analytical procedure performed to confirm the presence of a specific drug/metabolite in a urine specimen. This procedure uses a more sophisticated technique (e.g. Gas Chromatography / Mass Spectrometry, EBT) to ensure reliability and accuracy. With breath testing for alcohol, the Confirmatory Test is conducted on an EBT which has the capability to print out the results, date and time, a sequential test number, and the name and serial number of the testing device.

- **Consent** – Written consent for testing is required for all tests. A Donor will be asked to give written consent immediately prior to submitting a drug or alcohol test.

- **Covered Site** – A particular Turner Project or Turner Facility selected for random testing by a Third Party Provider.

- **Cut-off Level** - A pre-determined amount of drug metabolite, measured in nanograms (ng) per milliliter (ml) of urine, which dictates whether a tested specimen is negative or positive. As to alcohol, a pre-determined amount

of blood alcohol content, which dictates whether a tested specimen is negative or positive. For example, a test would be declared positive if the amount of drug/metabolite or blood alcohol content were equal to or above the Cut-Off Level.

- **Designated Jobsite Turner Representative** – A Turner designated employee and/or his or her designees on a particular Turner Project or at a Turner Facility responsible for coordinating drug and alcohol testing and related procedures.

- **Diluted Sample** – A specimen with creatine and specific gravity values that is lower than expected for human urine. This type of test will always be sent with MRO comments stating, "Recollection suggested no fluids three (3) hours prior to test." A Donor providing a Diluted Sample will be retested within twenty-four (24) hours and in no case more than forty-eight hours after the Diluted Sample was obtained.

- **Donor** – a Turner Employee or Other Worker giving a urine, breath, blood, or saliva (which is only used for alcohol testing) sample for drug or alcohol testing.

- **Medical Review Officer (MRO)** - A licensed physician responsible for receiving laboratory results generated by a substance abuse screening program who has knowledge of substance abuse disorders and who received appropriate medical training to interpret and evaluate a worker's medical history and other relevant biomedical information. The MRO is certified by either the American Association of Medical Review Officers (AAMRO) or the American College of Occupational and Environmental Medicine (ACOEM).

- **Medical Examination** – An examination conducted by a duly licensed medical provider.

- **Negative Test Result** - A negative screening is obtained if: (1) the screen test indicated the absence of legal or Prohibited Substances below the screen limit, or (2) the screen test indicates the presence of legal or Prohibited Substances in excess of the screen limit but the confirming test indicates the absence of legal or Prohibited Substances below the confirming limits

- **Non-Negative Test Result** - An initial drug or alcohol test result that indicates the presence of legal or Prohibited Substances in excess of the screen limit and is subject to a Confirmatory Test.

- **Other Workers** – All other person, not directly employed by Turner, working on a Turner Project, at a Turner Facility, or working on or otherwise engaged in Turner business. This includes all contractors, subcontractors, consultants, construction managers, and their respective employees or agents working on a Turner Project, at a Turner Facility, or while working on or otherwise engaged in Turner business. The term "Other Worker" includes, but is not limited to, craft personnel, management personnel, temporary personnel and/or consultants.

- **Positive Test Result (Alcohol)**- A Positive Test Result (Alcohol) is obtained if a Confirmatory Test indicates the presence of alcohol at or in excess of the Cut-Off Level of 0.04% blood alcohol content.

- **Positive Test Result (Drugs)** - A Positive Test Result (Drugs) is obtained if the MRO has verified that the test results contain a Prohibited Substance(s) at or above the standard Cut-Off Levels of any of the substances tested and for which there is no valid medical or other explanation.

- **Post-Accident/Incident Testing** – A drug or alcohol test which may be conducted following the occurrence of an Accident/Incident.

- **Pre-Employment Drug Testing** – For Turner Employees, a drug and/or alcohol test which may be conducted prior to employment by Turner or prior to admission to a Turner Project. For Other Workers that do not have, in Turner's sole discretion, an acceptable substance abuse testing cards, badges, or proof of Negative Testing Results from the last twelve (12) months provided by the respective Other Worker's employer or trade union, a

drug and/or alcohol test which may be conducted prior to beginning any work on a Turner Project, at a Turner Facility, or working on or otherwise engaging in Turner business.

- **Prohibited Substance -** A substance whose use or possession is controlled by federal law but that is not being used or possessed under the supervision of a licensed health care professional in a manner that is consistent with applicable federal, state, and local law.

- **Quick / Instant Test** – A test that is a qualitative one-step immunochromatographic test panel for the detection of Cannabinoids (THC), Opiates, Amphetamines, Cocaine, Phencyclidine (PCP), Barbiturates, Benzodiazepines, Propoxyphene, and Methamphetamines 3, 4-Methylenedioxymethamphetamine drugs and/or their metabolites in human urine. This test provides only a preliminary analytical result. A more specific alternate chemical method must be used in order to obtain a confirmed analytical result. The device used for this Quick / Instant Test includes a Lateral Flow (LATFLO) Adulterant Strip (LFAS) for the visual determination of Specific Gravity, Nitrite, Oxidants, and pH to evaluate human urine specimens for adulteration prior to urine testing for drugs.

- **Random**- A system of drug testing imposed without individualized suspicion that a particular individual is using prohibited substances. Random drug testing consists of unannounced substance abuse screens of particular groups or individuals selected through a neutral randomizing system, subject to requirements and limitations of a collective bargaining agreement, when applicable, but only to the extent of a conflict therein with performing a random test.

- **Refusal to Test** – When a Donor refuses to provide a urine, breath, saliva or (on occasion) blood sample upon reasonable request from Turner or from the Other Worker's employer, based on any circumstances in the "Types of Testing" Section.

- **Reasonable Suspicion**- Reasonable Suspicion of drug or alcohol abuse is based on objective evidence about the Turner Employee's or Other Worker's conduct in the workplace that would cause a reasonable person to believe that the individual is demonstrating signs of impairment. In most cases, the objective evidence giving rise to Reasonable Suspicion will be observed by at least two (2) Turner Employees or Other Workers, but recognizing that in certain circumstances the observation may be made by only one (1) such person. Examples of objective evidence include, but are not limited to, odors, difficulty in maintaining balance, slurred speech, erratic or atypical behavior.

- **Screen or Screening** – The initial drug or alcohol test given to screen out potential substance abusers. After the initial screen, a Confirmatory Test will be performed on any Non-Negative Test Result to verify the initial Screen.

- **Screening For Cause** – Drug or alcohol screen which may be ordered when a Turner Employee's or other Worker's Fitness for Duty is in question or following treatment in a drug or alcohol treatment program.

- **Split Specimen Testing** – When a urine sample is taken for drug screen testing, the specimen is split and one part is used for initial testing and the remainder of the specimen is reserved for additional retesting.

- **Substance Abuse and Mental Health Services Administration (SAMHSA)** - A federal government agency, which certifies substance abuse laboratories.

- **Substance Abuse Administrator** – A Turner designated employee and/or his or her designees responsible for the coordination, implementation and administration of this Policy.

- **Substituted Test** – A Substituted Test is a urine sample with creatine and specific gravity values that are so diminished that they are not consistent with human urine. This could indicate evidence of a substance other than the Donor's urine being substituted for the urine screen. This type of sample with a Verified Test Result shall be considered as a Refusal to Test, which is treated the same way as a Positive Test Result.

- **Third Party Provider** – A neutral third party company engaged by Turner or an approved Alternative Program Administrator to manage drug and alcohol testing and to design and/or implement random selection procedures and systems.

- **Turner Employee** – All persons employed directly by Turner, whether staff, corporate, or trade. This includes employees of Turner at any and all Turner Facilities, including business centers, offices, and construction worksites.

- **Turner Project or Turner Facility** – A project or facility which Turner owns, operates, manages, or over which Turner exercises control, including state, federal or other contracts held by Turner, and to which this Policy applies.

- **Turner Property** – Includes, but not is not limited to, all Turner owned or leased buildings, parking lots, recreation areas, vehicles, equipment, desks, lockers, furnishings, and equipment wherever located. It may also include state property at construction projects over which Turner exercises control.

- **Termination**- In the case of a Turner Employee, Termination shall mean termination of employment by Turner. In the case of Other Workers, Termination shall mean the immediate removal of the Other Worker from the Turner Project or Turner Facility by his or her employer and a ban from working at or on a Turner Project or Turner Facility in any capacity to which this Policy applies until the Other Worker has successfully completed Rehabilitation as describe on Page 18.

- **Verified Positive Test Result** – A test result that was positive on an initial immunoassay test or alcohol test, confirmed by a Confirmatory Test using a Gas Chromatography/Mass Spectrum assay for drugs or EBT device for alcohol, and reviewed and verified by the MRO in accordance with this Policy.

- **Verified Test Result** – A test result that is confirmed by a Confirmatory Test using a Gas Chromatography/Mass Spectrum assay for drugs or EBT device for alcohol, and reviewed and verified by the MRO in accordance with this Policy.

- **Voluntary Assistance** – Any Turner Employee who feels that he or she has a drug, alcohol, or related issue is encouraged to seek professional help. Turner can refer such Turner Employee to seek voluntary professional assistance. Assistance given to the Turner Employee shall be kept strictly confidential.

The Turner Corporation Policy on Substance Abuse ("Policy")

Importance of Policy to Turner Core Values

To help insure a safe, healthy, and productive work environment for the employees of The Turner Corporation, Turner Construction Company and all Turner subsidiaries (collectively known as "Company" or "Turner"), and other persons on Turner projects or at Turner Facilities, and to protect Company property and ensure efficient operations, Turner has adopted a policy of maintaining a workplace free of drugs and alcohol.

Policy Summary

All Turner Employees and Other Workers are prohibited from using, possessing, distributing, dispensing, manufacturing, or being under the influence of Prohibited Substances and from abusing chemicals, controlled substances, or alcohol while working on a Turner Project, at a Turner Facility, or while working on or otherwise engaged in Turner business. Turner is committed to this Policy on substance abuse to maintain a safe environment for all Turner Employees and Other Workers. This Policy establishes guidelines for acceptable and unacceptable behavior in connection with working on behalf of Turner. Turner will not tolerate substance abuse in violation of this Policy.

Turner reserves the right in its sole discretion to modify, update, and/or replace the Policy's provisions. Furthermore, at all times, Turner remains solely responsible for the interpretation of the Policy's provisions and their applications.

The Policy is intended to comply and be construed in a manner so as not to conflict with applicable laws and regulations governing workplace drug testing and substance abuse policies. If any provision of the Policy or the application thereof to any person or circumstance is held invalid or unenforceable to any extent, the remainder of the Policy and the application of that provision shall remain in full force and effect to the maximum extent permitted by law.

Persons to Whom Policy Applies

This Policy specifically applies to all Turner Employees, Other Workers, and any and all employers of Other Workers working on a Turner Project, at a Turner Facility, or while working on or otherwise engaged in Turner business.

This Policy is non-discriminatory and applies equally to all Turner Employees, Other Workers, and their respective employers, as defined above, working on a Turner Project, at a Turner Facility, or while working on or otherwise engaged in Turner business.

Scope and Application

All persons or entities covered by this policy understand and agree that Alternative Programs may be utilized as required by law, contract, or insurance agreement and they will comply with such other Alternative Programs where applicable.

In Turner's sole discretion, Turner may accept substance abuse testing cards, badges, or proof of Negative Test Results for an Other Worker within the last twelve (12) months that is provided by the respective Other Worker's employer or trade union. All Other Workers reporting to work on a Turner Project, at a Turner Facility, or while working on or otherwise engaged in Turner business, without substance abuse testing cards, badges, or proof of a Negative Test Results (and ID), will not be permitted to work unless and until such proof is demonstrated or such Other Worker has submitted and successfully passed a Pre-Employment Drug Test.

Additionally, Turner will work with any union representing Turner Employees or Other Workers covered by this Policy. Where any issues in this Policy are otherwise covered by a collective bargaining agreement, the collective bargaining agreement takes legal precedence and must be followed.

This Policy includes pre-employment, post-Accident/Incident, reasonable suspicion, re-employment, medical examination, annual and random testing, to the extent permissible by law.

Strict Adherence to Policy Required of Turner Employees, Other Workers and Their Respective Employers

Every Turner Employee and Other Worker is responsible for reviewing and understanding this Policy. As a condition of employment, all Turner Employees must abide by this Policy. With respect to Other Workers, continued work and engagement on Turner Projects is conditioned on strict adherence to this Policy or an acceptable Alternative Program.

Any and all employers of Other Workers must ensure full compliance with any and all aspects of this Policy or an acceptable Alternative Program, including the compliance of their respective employees.

Designation and Responsibilities of the Substance Abuse Administrator

Turner will designate a Substance Abuse Administrator to be responsible for the administration and implementation of this Policy. Among other things, the Substance Abuse Administrator will:

- Have primary responsibility for the coordination, implementation, and administration of this Policy;
- Coordinate all testing with any appropriate Third Party Provider(s);
- Receive the test results from the MRO and notify the Designated Jobsite Turner Representative and Turner's safety personnel of the drug results, and notify the tested Turner Employee or Other Worker and the Other Worker's employer of the results; and
- Assure the reliability and confidentiality of testing processes and procedures.

General Substance Abuse Rules

1. Using, possessing, distributing, dispensing, manufacturing, or being under the influence of Prohibited Substances, and/or abusing chemicals or controlled substances while working on a Turner Project at a Turner Facility, or while working on or otherwise engaged in Turner business, is strictly prohibited.
2. Legally prescribed drugs may be permitted, provided that the drugs are prescribed to the Turner Employee or Other Worker by an authorized medical practitioner for current use by the Turner Employee or Other Worker and provided that such legally prescribed drugs do not prevent the safe performance of such person's essential job functions. Please see "Prescription Drugs" on page 11 for further information.
3. The possession or use of alcohol while working on a Turner Project, at a Turner Facility, or while working on or otherwise engaged in Turner business is prohibited. Turner sponsored or approved meetings/functions are exempt from this rule. However, this does not relieve Turner Employees or Other Workers from possessing or using alcohol responsibility and safely in such situations.
4. Refusing to report for or submit consent to drug or alcohol testing is prohibited and may be treated as if a Positive Test Result had been obtained.
5. Adulteration or Substitution of a test is prohibited and may be treated as if a Positive Test Result had been obtained.

Confidentiality

All substance abuse testing will be performed with concern for each Turner Employee's or Other Worker's personal privacy, dignity, and confidentiality. Each Turner Employee and Other Worker will be required to sign a consent and chain of custody form, assuring proper documentation and accuracy. Turner Employee testing records shall not be maintained in personnel files. Records may be kept in a separate confidential file at Turner's office or at the project level for that particular project. Turner Employees shall have the right to a copy of their drug testing results within a reasonable amount of time following a request. Other Workers shall contact the Substance Abuse Administrator if they wish to have a copy of their drug testing results. All actions taken under this Policy will be confidential and disclosed only to those with a need to know.

Protections Related to Drug Screen Testing

- A formal Chain of Custody will be established for every drug test.
- Initial samples (or a split portion thereof) that test non-negative will be retested for verification with a Confirmatory Test, using the Gas Chromatography/Mass Spectrometry ("GC/MS") test,
- GC/MS Positive Test Results will be communicated to the MRO,
- The MRO will receive the GC/MS Positive Test Results and convey the fact of a Verified Positive Test Result to the Substance Abuse Administrator and to the Donor tested and his or her employer.
- Turner Employees or Other Workers who test positive may, within twenty-four (24) hours of being advised of the results, request a retest of the original split-specimen sample by a different SAMHSA certified laboratory, at the Turner Employee's or Other Worker's expense.
- No drug or alcohol test will be conducted without the Turner Employee's or Other Worker's consent. The Donor shall be required to sign a consent form. Refusal to give consent shall be cause for removal/barring from the Turner Project or Turner Facility and may be treated as if a Positive Test Result had been obtained.

Testing Procedures

Procedures for Drug Screen Testing

Urine specimens will be analyzed for the presence of all or some of the following[1]:

- Cannabinoids (Marijuana)[2]
- Cocaine
- Opiates
- Amphetamines
- Phencyclidine
- Barbiturates
- Benzodiazepenses
- Proporyphene
- Methadone

The following chart illustrates the Cut-Off Levels for some of the drugs tested:

Drug	EMIT Screen (ng/ml)	GC/MS Confirmation (ng/ml)
Amphetamines	1,000	500
Cannabinoids (Marijuana/THC)	50	15
Cocaine	300	150
Opiates	2,000	2,000
Phencyclidine (PCP)	25	25

Appropriate Cut-Off Levels for all other drugs tested will be determined by the SAMHSA approved laboratory conducting the testing and the Medical Review Officer.

1. Urine drug screen specimens may be collected on-site by a SAMHSA approved laboratory or at an offsite medical facility or clinic. In general, Donors will be permitted to give a urine specimen in privacy and without being observed by collection site personnel. However, a Donor forfeits this right whenever there is a reason to believe that he/she may alter or substitute a specimen.

2. If the Donor does not provide a sufficient amount of urine for a drug test, he/she must drink up to forty (40) ounces of fluid, distributed reasonably through a period of up to three (3) hours, or until the Donor has provided a sufficient urine specimen. If the Donor refuses to make the attempt to provide a new urine specimen or leaves

[1] Turner reserves the right to add additional drugs to this list upon notice and consent of the Turner Employee or Other Worker being tested.

[2] Turner is aware that certain states/localities have decriminalized (or may do so in the future) the possession of marijuana for recreational and/or medicinal use. In light of the forgoing, Turner wants to make it clear that any changes to state or local laws regarding the recreational or medicinal use of marijuana will have no bearing on the Policy. Marijuana — whether used for medicinal or recreational purposes — continues to be an illegal drug under federal law and a Prohibited Substance under the Policy. As such, any worker who tests positive for marijuana above the standard cut-off level will be subject to the consequences of a positive drug test result pursuant to the Policy. Turner remains committed to its Policy in order to maintain a safe and productive workplace environment for all workers on its jobsites.

the area where the collections are being done this will be considered a Refusal to Test. If the Donor has not provided a sufficient specimen within three (3) hours of the first attempt. The collector will discontinue the collection and notify the Substance Abuse Administrator and/or Designated Jobsite Turner Representative or Alternative Program Administrator. After consulting with the MRO, the Donor will be directed to obtain within five (5) business days, an evaluation from a licensed physician. If the Donor proves that he or she has a medical condition that has, or with a high degree of probability could have precluded the Donor from providing a sufficient amount of urine, the MRO will mark the test as "Cancelled" and no further action will be taken. A medical condition includes an ascertainable physiological condition (e.g., a urinary system dysfunction) or a medically documented pre-existing psychological disorder, but does not include unsupported assertions of "situational anxiety" or dehydration. If there is not an adequate basis for determining that a medical condition has, or with a high degree of probability could have, precluded the Donor from providing a sufficient amount of urine, the MRO will mark the test as Refusal to Test.

3. Turner Employees and Other Workers will be preliminarily tested using the Quick/Instant Test Drug Test. This system provides results in five (5) minutes.

4. A SAMHSA approved laboratory will confirm screens that test non-negative. All urine samples will be split-specimen tests, ensuring that any required or requested retests can be done using the original sample. A Confirmatory Test will use GC/MS to ensure reliability and accuracy.

5. Before a Donor's test result will be confirmed positive for drugs, the Donor will be given the opportunity to speak with Turner MRO and bear the burden of proof that there was a legitimate medical explanation for the Positive Test Result. If the MRO determines that a legitimate medical reason does exist, the test result will be reported as a Negative Test Result. If the MRO determines that a legitimate medical reason that does exist, the test result will be reported as a Negative Test Result. If the MRO determines that a legitimate medical reason does not exist, the test result will be reported as a Verified Positive Test Result. A Positive Test Result will not be reported to Turner until the Confirmatory Test has been completed and the MRO has consulted with the Turner Employee or Other Worker regarding any legitimate medical explanations. Since the Policy is first and foremost concerned with the safety, the Donor whose results are pending will not be allowed to work at a Turner Project or Turner Facility until this process is complete.

6. Diluted Samples occur when a Donor drinks large amounts of fluids before the drug test, or adds water to the specimen so that it is harder to detect drug abuse. Donors may innocently drink too many fluids before the drug test in order to be able to give a sample. This can be avoided by the Donor not drinking more than twenty-four (24) ounces within three (3) hours of the drug test. It is the responsibility of the Donor to provide Turner with an undiluted sample that can be tested. Turner's Policy regarding Diluted Samples is to retest the Donor one (1) additional time. Ideally, the Turner Employee or Other Worker should be retested within twenty-four (24) hours of receiving the results from the MRO, and in no case more than forty-eight (48) hours after the Diluted Sample was obtained, if the Donor provides a second Diluted Sample, the MRO will conduct a medical interview with the Donor. During the interview process, if it is determined that there is no legitimate medical reason; the Donor's test will be treated as a Positive Test Result.

7. A Verified Positive Test Result shall mean that the verified results are above standard Cut-Off Levels and that there is not a medically valid reason for the result. Any Turner Employee or Other Worker who tests positive for drugs, and who believes the test results are incorrect, may request a test of the original specimen at his/her own cost within twenty-four (24) hours. An equally qualified laboratory shall perform the retest. If the retest is negative and it is determined by the MRO that the initial confirmation screen was incorrect, the Turner Employee or Other Worker shall be allowed to resume work.

8. If the Confirmatory Test or retest for drugs is negative, Turner shall pay the Turner Employee for any lost time that may have occurred and reimburse the Turner Employee for the cost of a negative retest that was borne by the Turner Employee. The employer of an Other Worker whose Confirmatory Test or retest for drugs is negative shall be responsible for paying the Other Worker for any lost time that may have occurred and/or for reimbursing the Other Worker for the cost of a negative retest that was borne by the Other Worker.

9. Turner Employees who are removed from working on a Turner project, at a Turner Facility, or from working on or otherwise engaging in Turner business following a Verified Positive Test Result, may only be returned to work if certain criteria are met (as outlined below in the "Possible Re-Employment with Turner" Section). In all cases, there is no guarantee of re-employment.

Procedures for Alcohol Testing

1. A Department of Transportation (DOT) approved saliva testing device or "collect-only" device will be used for the initial alcohol screen. In cases where a saliva testing device is used for initial alcohol screen, a "hand held" Breathalyzer unit or equivalent device, similar to those used by law enforcement for field sobriety tests must be used for the Confirmatory Test. If a "collect-only" device is used, the sample will be collected and delivered to a SAMHSA approved laboratory for testing. A Confirmatory Test is not required if a "collect-only" device is used. Saliva or alcohol screen collections by breath or their equivalent may be performed on-site. When using a saliva testing device, any initial screens at or in excess of 0.02% blood alcohol content will be tested with a Confirmatory Test performed after a waiting period of at least fifteen (15) minutes, but not more than thirty (30) minutes. A SAMHSA approved laboratory will confirm on-site screens that test non-negative with a Confirmatory Test using an EBT that has the ability to print out the results, date and time, a sequential test number, and the name and serial number of the testing device. Any laboratory test from a "collect-only" device sample or Confirmatory Tests at or in excess of 0.04% blood alcohol content will be considered a Positive Test Result (Alcohol). A laboratory test from a "collect-only" device sample or Confirmatory Test at or above 0.02% but below 0.04% will not be considered either a Negative Test Result nor a Positive Test Result (Alcohol), however, the Donor will be suspended from safety-sensitive functions for at least twenty-four (24) hours following administration of the test.

2. Before a Donor's test result will be confirmed as a Positive Test Result (Alcohol), the Donor will be given the opportunity to speak with Turner's MRO and bear the burden of proof that there was a legitimate medical explanation for the Positive Test Result (Alcohol). If the MRO determines that a legitimate medical reason does exist, the test result will be reported as a Negative Test Result. If the MRO determines that a legitimate medical reason does not exist, the test result will be reported as a Verified Positive Test Result. A Positive Test Result (Alcohol) will not be reported to Turner until the laboratory test from a "collect-only" device sample or Confirmatory Test has been completed and the MRO has consulted with the Donor regarding any legitimate medical explanations. Since the Policy is first and foremost concerned with safety, the Donor whose results are pending will not be allowed on-site until this process is complete.

3. A Positive Test Result (Alcohol) shall mean alcohol levels are recognized as demonstrating alcohol intoxication at or in excess of 0.04% blood alcohol content. Any Turner Employee or Other Worker who tests positive for alcohol, and who believes the test results are incorrect, may request a retest of the original specimen of saliva at his/her own cost within twenty-four (24) hours. An equally qualified laboratory shall perform the retest. If the retest is negative, the MRO will review all data for a final determination. If it is determined that the initial confirmation screen was incorrect, the Donor shall be allowed to resume work.

4. If the Confirmatory Test or retest for alcohol is negative, Turner shall pay Turner Employee for any lost time that may have occurred any reimburse the Turner Employee for the cost of a negative retest that was borne by the Turner Employee. The employer of an Other Worker whose Confirmatory Test or retest is negative shall be responsible for paying the Other Worker for any lost time that may have occurred and/or for reimbursing the Other Worker for the cost of a negative retest that was borne by the Other Worker.

5. Turner Employees or Other Workers who are removed from working on a Turner project, at a Turner Facility, or from working on or otherwise engaging in Turner business following a Verified Positive Test Result, may only be returned to work if certain criteria are met **(as outlined below in the "Possible Re-Employment with Turner" Section)**. In all cases, there is no guarantee of re-employment.

Cost of Testing

Turner will pay the cost of the initial screen and Confirmatory Test for testing Tuner Employees under this Policy. The employers of Other Workers are responsible for the cost of screening and confirmation required under this Policy.

Refusal to Consent or Submit to/Report for Test When Directed

Any Turner Employee who refuses to sign a consent form and/or to submit to or report to a drug or alcohol screening test will be immediately removed from the Turner Project or Turner Facility and will be terminated, with no possibility or reemployment. Other Workers who refuse to sign a consent form and/or to submit to or report to a drug or alcohol screening test will be immediately removed by their employer from the Turner Project or Turner Facility, and will further be barred from any subsequent work on Turner Projects or at Turner Facilities.

Prescription Drugs

Reporting to and being at work under the influence of prescribed or over-the-counter drugs, where such use prevents a Turner Employee or Other Worker from performing his or her essential job functions, or poses a safety risk to him or her and/or other Turner Employees or Other Workers property, or which has the potential to cause an Accident/Incident, is prohibited. Turner Employees or Other Workers taking a prescription or over-the-counter drug are personally responsible for confirming with their physicians that they may safely perform any job duties while taking such items. Turner Employees or Other Workers taking a legal substance that could impair their safe work must advise their immediate supervisor.

Types of Testing

To the extent consistent with applicable federal, state and local laws and applicable collective bargaining agreements, a Turner Employee or Other Worker may be required to undergo a screening test for the use of Prohibited Substances and non-prescription drugs, or alcohol under any of the following (or other) circumstances which may be determined by Turner management in its sole discretion under this Policy:

1. Pre-employment – After a conditional offer of employment or prior to admission to a Turner Project. All potential Turner Employees will be tested after a conditional offer of employment but prior to the employment commencing. Potential Turner Employees who obtain a Positive Test Result will not be permitted to work on Turner Projects, at Turner Facilities, or otherwise engage in Turner business and the conditional offer of employment will be rescinded and such potential Turner Employees will not subsequently be considered for any other Turner employment opportunities. If a former Turner Employee returns to employment with Turner following an absence longer than one (1) year, Turner will retest such Turner Employee with pre-employment testing prior to the re-employment commencing (former Turner Employees who are re-employed following a violation of this Policy and rehabilitation, however will be tested as outlined on page 12 in “Re-Employment” Testing). All Other Workers will be tested at their employer(s) expense prior to beginning any work on a Turner Project, at a Turner Facility, or working on or otherwise engaging in Turner business. However, during orientation/training, Turner may accept, from Other Workers, substance abuse testing cards, badges, or proof of Negative Testing Results from the last twelve (12) months provided by the respective Other Worker’s employer or trade union.
2. Post-Accident/Incident – When a Turner Employee or Other Worker is involved in an Accident/Incident (as defined above in “Definitions”). If the Turner Employee or Other Worker is treated in a medical facility which fails to collect a specimen for testing, Turner may require the Turner Employee or Other Worker to be tested within thirty-two (32) hours of the event. A Positive Test Result may result in the denial of Workers’ Compensation for an injury resulting from the Accident/Incident.
3. Reasonable Suspicion – When there is reasonable suspicion, satisfactory to Turner, to believe that a Turner Employee or Other Worker is using, possessing, distributing, dispensing, manufacturing, or is under the influence of Prohibited Substances or abusing chemicals, controlled substances, or alcohol while working on a Turner Project, at a Turner facility, or while working on or otherwise engaged I Turner business, or when there is reasonable suspicion satisfactory to Turner to believe that the Turner Employee or Other Worker has reported to work under the influence of Prohibited Substances, unauthorized controlled substances, alcohol or other intoxicants which could affect the safety of others or of property.

4. Medical Examination – As part of any medical examination or fitness for duty examination provided or required by Turner.
5. Re-Employment – Upon re-employment or re-instatement to a Turner Project, at a Turner Facility, or to work on Turner business following a violation of this Policy and rehabilitation as outlined on page 17 in "Possible Re-Employment with Turner." Further testing will occur without prior notice for a period of eighteen (18) months following re-employment or re-instatement.
6. Annual – When Turner requires screening on a yearly basis.
7. As needed – As required by Turner/Owner Agreements, other applicable agreements, contractual obligation or government regulation.
8. Random – Turner will conduct Random Testing as follows:
    - All random selections and test processing will be administered by the Third Party Provider(s) selected by Turner.
    - Random Testing will be conducted at a predetermined frequency, to be reasonably spaced throughout the calendar year. At least five percent (5%) of Turner Employee will undergo Random Testing on an annual basis.
    - Except to the extent a Turner Project or Turner Facility is otherwise subject to an acceptable or negotiated Alternative Program, all Turner Projects and/or Turner Facilities will be eligible for Random Testing each time Random Testing occurs, regardless of having been selected previously. However, when applicable, the terms of a state, federal, or owner contract regarding frequency of testing and percentage to be tested will control.
    - All eligible Turner Projects and Turner Facilities will be assigned to testing pools distinguished by job-type criteria agreed upon by Turner. Subject to applicable terms of a state, federal, or owner contract regarding frequency of testing and percentage to be tested, the Third Party Provider's computerized program will randomly select five percent (5%) of the eligible Turner Projects and Turner Facilities in each group or pool to be Covered Sites. When a selection occurs, the Turner Projects or Turner Facilities that are available for selection will be put on a run list. At the time of selection, the Third Party Provider shall notify the applicable Substance Abuse Administrator(s) and Turner safety director(s) of the selected Covered Sites.
    - Included in the testing pools will be all Turner Employees and Other Workers on any Covered Site. Subject to applicable terms of a state, federal, or owner contract regarding frequency of testing and percentage to be tested, the Third Party Provider's computerized program will randomly select ten percent (10%) of all Turner Employees and Other Workers currently working on each of the Covered Sites as "Primary Random Selections". Subject to applicable terms of a state, federal, or owner contract regarding frequency of testing and percentage to be tested, the Third Party Provider's computerized program will randomly select and assign a random number to an additional ten percent (10%) of all Turner Employees and Other Workers currently working on each of the Covered Sites as "Secondary Random Selections". The selected lists will be managed by the Third Party Provider and the Substance Abuse Administrator.
    - The Third Party Provider will schedule an on-site collector to be dispatched to the selected Covered Site on the arranged date and time, unannounced to the personnel at each of the Covered Site selected. All available Primary Random Selections at the Covered Site are subject to testing at the date and time of the scheduled random testing. Each Turner Employee or Other Worker that is a Primary Random Selection but is not present at the selected Covered Site for any legitimate business reason (e.g., vacation, illness, business travel, etc.) will be considered unavailable for testing and will be replaced, for Random Testing purposes, with a Secondary Random Selection having the lowest randomly generated number.

Company Provided Education and Training

General Provisions

In conjunction with its commitment to a drug free workplace, Turner will provide education to all Turner Employees. This education will cover substance abuse issues and is intended to help reduce the risk of Accidents/Incidents caused by drugs and/or alcohol. Turner's supervisors will receive additional training which will help them identify and help employees who show signs of alcohol or drug use. Employers of Other Workers shall provide such education and training for their employees as may be required by applicable laws, ordinances or statutes mandated by the local, state or federal government

Penalties

Violation of any of the rules associated with this Policy may result in disciplinary action up to and including termination of employment for Turner Employees or the future inability to work on Turner Projects or Turner Business for Other Workers. The following penalties exist for violation of this Policy:

Violation	First Offense	Second Offense
Possession	Turner Employees- Immediate removal from Turner Project or Turner Facility and termination, with no possibility or re-employment.	N/A.
	Other Workers-Immediate removal from Turner Project or Turner Facility by the Other Worker's employer. Barred from any subsequent work on Turner Projects of at Turner Facilities.	N/A.
Distribution of drugs/paraphernalia	Turner Employees-Immediate removal from Turner Project or Turner Facility and termination, with no possibility or re-employment.	N/A.
	Other Workers – Immediate removal from Turner Project or Turner Facility by the Other Worker's employer. Barred from any subsequent work on Turner Projects or at Turner Facilities.	N/A.
Use of Prohibited Substances or Alcohol Abuse (Upon discovery via actions or testing)	Turner Employee - Immediate removal from Turner Project or Turner Facility and termination. Possible re-employment upon proof of successful rehabilitation and re-employment testing. Clean screen required prior to re-employment and continued testing over the eighteen (18) months following re-instatement.	Termination, with no possibility of re-employment.
	Other Workers - Immediate removal from Turner Project or Tuner Facility by the Other Worker's employer. Barred from any subsequent work on Turner Projects or at Turner Facilities until Turner is provided proof of successful rehabilitation and pre-employment testing. . Turner does not provide Employee Assistance to Other Workers. Other Workers must approach their respective employers.	N/A.

Violation	First Offense	Second Offense
Use of Prohibited Substances or Alcohol Abuse (Per voluntary request by Turner Employee for help)	Turner Employee - Immediate removal from Turner Project or Turner Facility. Re-instatement upon proof of successful rehabilitation and re-employment testing. Clean screen required prior to returning to work and continued testing over the eighteen (18) months following the return to work.	Termination with no possibility of re-employment.
	Other Workers - N/A	N/A.
Under the Influence of Prohibited Substances or Alcohol at Work	Turner Employee - Immediate removal from Turner Project or Tuner Facility and termination. Possible re-employment upon proof of successful rehabilitation and re-employment testing. Clean screen required prior to reinstatement and continued testing over the eighteen (18) months following re-instatement.	Termination, with no possibility of re-employment.
	Other Workers - Immediate removal from Turner Project or Turner Facility by the Other Worker's employer, Barred from any subsequent work on Turner Projects or at Turner Facilities until Turner is provided proof of successful rehabilitation and pre-employment testing. . Turner does not provide Employee Assistance to Other Workers must approach their respective employers.	N/A.
Failure to Report Use of Over the Counter Prescription Drugs Which Affect	Turner Employees-Discipline, up to and including termination, with or without the possibility of re-employment.	Termination, with no possibility of re-employment.

Performance	Other Workers - Immediate removal from Turner Project or Turner Facility by the Other Worker's employer. In Turner's sole discretion, Other Worker may be required to provide proof of successful rehabilitation and pre-employment testing prior to any subsequent work on Turner Projects or at Turner Facilities. Turner does not provide Employee Assistance to Other Workers must approach their respective employers.	N/A
Violation	**First Offense**	**Second Offense**
Positive Test Following Accident/Incident	Turner Employee - Immediate removal from Tuner Project or Turner Facility and termination. Possible re-employment upon proof of successful rehabilitation and re-employment testing. Clean screen required prior to reinstatement and continued testing over the eighteen (18) months following re-instatement. **May be ineligible for Worker's Compensation.**	Termination with no possibility of re-employment.
	Other Workers - Immediate removal from Turner Project or Turner Facility by the Other Worker's employer, Barred from any subsequent work on Turner Projects or at Turner Facilities until Turner is provided proof of successful rehabilitation and pre-employment testing. Turner does not provide Employee Assistance to Other Workers; they must approach their respective employers.	N/A.
Refusal to Consent or Submit to/Report for Test When Directed	Turner Employee - Immediate removal from Turner Project or Turner Facility and termination, with no possibility of re-employment.	N/A.
	Other Workers - Immediate removal from Turner Project or Turner Facility by Other Worker's employer. Barred from any subsequent work on Turner Projects or at a Turner Facility.	N/A.

Notwithstanding the stated penalties, Turner reserves the right to discipline, up to and including termination, any Turner Employee and/or to ban Other Workers from any Turner Project and/or Turner Facility. Nothing herein in any way grants or confers any implied contractual right to any individual with respect to employment with Turner or alters any employment at-will status of a Turner Employee.

Notification of Authorities

In addition to all other remedies or penalties, Turner may report information concerning possession or distribution of any Prohibited Substance or unauthorized controlled substances to law enforcement officials will cooperate fully in the prosecution and/or conviction of any violators of the law.

Employees Convicted of Drug Offenses

Turner Employees or Other Workers must, as a condition of continued employment, notify their "Operations Manager" or employer, respectively, of any conviction of a criminal drug offense within five (5) days after said conviction. IF an employer is notified, then that employer shall notify the Turner Operations Manager immediately. If the Turner Employee or Other Worker convicted of the criminal drug offense is working on federal contract or grant, Turner will notify the Federal Contracting Agency of criminal drug convictions within thirty (30) days after Turner has received notice. Any Turner Employee or Other Worker so convicted must satisfactorily complete a Turner approved drug rehabilitation program and agree to periodic testing any time thereafter, before Re-Employment or a lift on a ban from working the federal contract will be considered. *Failure to report such a conviction and/or participate in a drug rehabilitation program may result in disciplinary action, up to and including, suspension, barring, and/or termination*.

Employee Assistance Program: Rehabilitation and Treatment

Turner is committed to helping Turner Employees who seek help from Turner for substance or alcohol abuse problems prior to any drug/alcohol testing or Accidents/Incidents.

Any Turner Employee who feels that he or she has a drug or alcohol related problem is encouraged to seek professional help. If a Turner Employee voluntarily notifies a supervisor or manager before testing that he or she may have a drug or alcohol problem, Turner will counsel the Turner Employee voluntarily seeking such help. Such person will be provided with a list of employee assistance vendors. Any such action by a Turner Employee shall be kept strictly confidential.

In certain circumstances, Turner Employees who have violated this Policy may also be referred to Turner's Employee Assistance Program ("EAP") and be eligible for a leave of absence and re-instatement (for those Turner Employees who have voluntary requested help from Turner for the use of Prohibited Substances or alcohol abuse). Further details regarding the EAP may be found in Turner's Summary Plan Description ("SPD") or by visiting www.turnerbenefits.com and clicking on "Plan Details." In addition, a Turner Employee may contact the EAP directly by dialing 1-877-887-6266 and following the instructions.

Please refer to the Penalties Chart on pages 14-16 for the consequences and re-instatement and re-employment rights for various drug and alcohol violations.

If treatment necessitates a leave of absence, accrued vacation, sick leave time, and/or an unpaid leave of absence may be used, pursuant to the limitations of those respective policies.

Other Workers are not eligible for Turner's EAP. Such a benefit may be provided by Other Worker's respective employers.

Possible Re-Employment with Turner

Employment with Turner is an at-will employment relationship. There is never a guarantee of re-employment with Turner.

Turner Employees who are terminated from working on a Turner Project or at Turner Facility following certain Violations, including Use of Prohibited Substances or Alcohol (Upon discovery via actions or testing), Use of Prohibited Substances or Alcohol (Per voluntary request by Turner for help), Under the Influence of Prohibited Substances or Alcohol at Work, and Positive Test Following Accident/Incident may be returned to work only if following criteria are met:

- The Turner Employee works with an EAP counselor as detailed above and/or successfully completes and provides proof of completing a Turner Certified/Recognized Substance Abuse Rehabilitation Program at their own expense or at the expense of an Alternative Program Administrator if such Alternative program has an accepted program in place;
- The Turner Employee submits a written request to the Business Unit Director of Safety and Loss Control for approval prior to his/her return to work. A copy of the certificate of completion of the program must be attached;

- The Turner Employee submits to a re-employment drug test which has a Negative Test Result; and
- The Turner Employee consents and submits to additional testing without prior notice for a period of eighteen (18) months following re-employment or re-instatement, with all tests having a Negative Test Result.

Rehabilitation of Other Workers

Other Workers who are removed from Turner Project or Turner Facility by the Other Worker's employer and barred from any subsequent work on Turner Projects of at Turner Facilities pursuant to the "Penalties" section of this Policy may work in the future on a Turner Project or Turner Facility only if the following criteria are met(This option for rehabilitation does not apply to an Other Worker with an offense for Possession and/or Distribution of drugs/paraphernalia or Refusal to Consent or Submit to/Report for Test When Directed) :

- The Other Worker successfully completes a Substance Abuse Rehabilitation Program at their own expense or at the expense of their employer if such employer has an accepted program in place and proof of completion of such program is provided to Turner's **Medical Review Officer** and;

- The employer submits a written request to Turner's Director of Safety and Loss Control for approval prior to Other Worker's return to work. A copy of the certificates of completion must be attached and;

- The Other Worker tests negatively for drugs and/or alcohol before returning to the work site.