

SITE SPECIFIC SUBCONTRACTOR SAFETY ORIENTATION

A. SUBCONTRACTOR GENERAL SAFETY REQUIREMENTS

1. Subcontractor Compliance

The subcontractor shall ensure that employees, agents and their subcontractors comply with all applicable Health, Safety and Environmental standard requirements (HSE), including but not limited to, federal, state and local regulations; specifically the latest edition of 29 CFR 1926.

2. Site Requirements

Subcontractor is required to meet all applicable federal, state and local requirements for adequate drinking water, first aid and PPE safety requirements.

3. Accident and Hazard Reporting

All injuries, accidents and safety hazards shall be immediately reported to the employee's immediate supervisor, the HSE Manager or the Project General Manager. Failure to report injuries and accidents immediately is grounds for disciplinary action, up to and including termination.

All subcontractors, as applicable, are required to maintain the following OSHA recordkeeping forms:

- OSHA Form 300
- OSHA Form 300A
- OSHA Form 301

4. Personal Protective Equipment

Approved hard hats shall be worn at all times by all personnel when in construction areas and other work areas with potential overhead hazards. All WRL sites are 100% hard hat compliant. Other items necessary for safety or protection shall be issued by the subcontractor as required. Long pants, a short sleeve shirt and acceptable "construction grade" shoes or boots are required. Sneakers, sandals, athletic shoes and other light duty footwear are not acceptable. Hair styles which create a hazard shall be adequately controlled. Additional P.P.E. as required including fall protection above six feet, protection such as face shields shall be worn when cutting, grinding and shipping; and chemical splash goggles shall be worn when handling chemicals, acids and caustics in which the MSDS requires their use. Hearing protection is required as needed.

5. **Lifting**

Lifting and material handling shall be conducted in a controlled manner with consideration given to proper lifting techniques, using mechanical means and protecting against hand injury.

6. **Vehicles**

Only licensed drivers shall be allowed to operate vehicles. Seat belts shall be worn at all times when in vehicles. The speed limits shall be strictly observed. All traffic violations received during duty hours shall be reported to the employee's supervisor. All DUI offenses and any suspension of licenses shall be immediately reported to supervisor.

7. **Electrical Tools and Equipment**

Ground Fault Circuit Interrupters (GFCI) shall be used on all electrical tools and hand held equipment. Subcontractors must demonstrate that the assured grounding program is in place and is effective. All electrical tools shall be inspected daily and defective tools shall be removed from service and repaired in accordance with the manufacturer's recommendations.

8. **Hand Tools**

All tools use shall be in safe and good working condition. Defective or damaged tools shall be removed from the job site.

9. **Fall protection**

Each subcontractor is responsible for training employees in the hazards and control measures associated with working at heights six feet and higher. For each project, every subcontractor shall prepare and submit an Activity Hazard Analysis that specifies the control measures to be used to protect personnel who may be exposed to fall hazards in accordance with 29 CFR 1926.500, Subpart M-Fall Protection. The subcontractor shall submit in writing the name of its "competent person" for fall protection. All fall protection equipment shall be in good working order and shall be inspected by the competent person prior to each use.

10. **Ladders**

All ladders shall be in safe condition and have a 250 pound duty rating. Damaged ladders with broken rungs, split side rails or other defects shall not be used and shall be removed from the job site. Extension ladders shall be secured and shall extend a minimum of three (3) feet above the upper working surface. Stepladders shall be used in the open position, and the top

two steps shall not be used for weight bearing support. Fall protection shall be used for extensive work (work more than fifteen minutes) on stepladders when working more than six feet (6) feet from the ground. Fall protection shall also be used when the ladder places the waist of the worker above an adjacent platform handrail and creates a fall hazard of a greater distance than to the level of the base of the ladder. Non-conductive ladders shall be used for all electrical work. Ladders will be used as recommended by the manufacturer. Do not use an a-frame ladder in place of a straight ladder. All employees will use the three point connection method when climbing ladders. Do not carry tools or materials in your hands while climbing a ladder.

11. Walking and Working Surfaces

Walking and working surfaces shall be kept free of debris and other tripping hazards. All floor holes and floor openings shall be covered with a secure cover or barricaded, and shall be attended when open for work. Caution tape or flagging is not a barricade. Guardrails, which meet OSHA requirements, shall be used to protect wall openings and platforms four (4) feet or greater above adjacent surfaces.

12. Scaffolding

All scaffolding and work platforms shall be erected, maintained and dismantled in accordance with OSHA requirements. Scaffolding shall be fully X-braced on both sides. Scaffold grade lumber shall be used for all supports and planks. The platform shall be fully planked with all boards properly overlapped and cleated or secured. Every scaffold shall have a complete OSHA specified guardrail system, including a handrail, midrail and toe board. Each subcontractor shall submit in writing to WRL the name of its competent person that will supervise the scaffolding erection and subsequent work, and shall inspect scaffolding and sign the scaffolding tag each day before work begins. No scaffold work will be allowed without the competent person present. Incomplete or modified scaffolding shall not be used and shall be tagged to prevent use. All employees working on a scaffold must have received the required OSHA Scaffold user training prior to working on a scaffold.

13. Excavation

All work involving excavations shall be conducted in accordance with the requirements of OSHA 29 CFR 1926.652. Prior to the start of any excavation work, the subcontractor shall submit in writing its excavation competent person. Written proof of competency such as a certificate of training completed shall also be submitted. No trenching or excavation work shall be conducted without competent person approval and/or supervision. This competent person shall inspect the excavation for safety each day before

work begins and assess for proper protective systems based on hazards and soil type. There shall be a minimum of two means of egress from each excavation. For larger excavations, a means of egress shall be accessible at least every 25 feet. If required, the subcontractor shall procure and comply with dig permits prior to beginning excavation.

14. Demolition

Prior to starting demolition operations, an engineering survey shall be made by a competent person in accordance with 29 CFR 1926.850 Subpart T-Demolition. The survey shall include the identification of hazardous materials, and asbestos and lead-containing building materials.

15. Hoisting and Heavy Equipment

All cranes shall have a current certification sticker from an independent crane certification company, or the subcontractor shall demonstrate through objective evidence that the crane's inspection and maintenance program meets or exceeds OSHA requirements. Crane operators must have passed an annual physical as directed by OSHA Standards. Daily and periodic inspections shall be conducted and documented during the crane's use on the project as required by OSHA and the crane's manufacturer. Slings, chokers, wire ropes and other rigging shall be in good condition and shall be inspected prior to each use. Personnel conducting inspections shall be qualified and able to detect signs of unsafe or damaged rigging. Inspections shall be conducted in accordance with 29 CFR 1926.251 Subpart H. All hoisting equipment shall be operated in a manner consistent with the manufacturer's guidelines. A critical lift plan shall be submitted to the WRL Safety Manager for review and approval. Taglines will be used to control swinging loads. Forklift operators will have the required OSHA Forklift Operator training. Backup alarms will be in good working condition and flagmen used as needed for backing. A seat belt in working condition is required on all mobile vehicles. All equipment operators will have received specific Operator Safety training/certification as directed by Regulatory Compliance Regulations.

16. Hazard Communication

Subcontractors who use hazardous materials and chemicals shall maintain a written hazard communication program. Material containers shall be labeled as to contents and hazards. MSDS shall be available, on site, for review by employees. Workers shall be trained in the hazard communication program. MSDS shall be submitted for approval prior to bringing the chemical to the job site. WRL, subcontractors, and tier subcontractors may utilize shared MSDS records on multi-subcontractor sites, if feasible.

17. Training

Subcontractors are required to provide employees with training as required by OSHA. Each subcontractor must properly document its employee training and submit documentation to WRL. Required documentation includes topics, trainer, date of training, and signature of attendees. OSHA training includes, but is not limited to the following: Ladders, scaffolding, excavation, hazard communication, respiratory protection equipment, powder actuated tools, hearing conservation, confined space entry, cranes and rigging, fall protection, hazard recognition and OSHA standard requirements.

18. Fire protection and prevention

Work areas shall be kept free from combustibles and flammables liquids. Fire extinguishers and a qualified person designated as a "fire watch" shall be posted at all blind spots during hot work operations. Fire extinguishers shall be provided during use and/or storage of flammable or combustible materials. Fire extinguishers must be provided even if existing customer extinguishers are present. All flammable liquids shall be stored in F.M. or U.L. approved flammable liquid storage cans which have spring loaded lids, flash arrest screens and venting capabilities. A hot work permit and/or work clearance from WRL is required prior to the performing hot work activities.

19. Housekeeping

Continuous housekeeping practices shall be maintained on all WRL work sites. Subcontractors shall secure extension cords and sweep areas of trash and debris before leaving the site for the day. All subcontractor supervisors shall conduct a walk-through of the job site at the end of each shift to identify any tripping, foot penetration, fire, or other safety hazard.

20. Drugs, Alcohol and "Horse Play."

The use of drugs and alcohol and "horse play" on the job by any personnel is strictly prohibited. If influence of drugs is suspected, urinalysis testing may be required and administered by the WRL Project Manager or other WRL designated person(s).

21. Safety Reflective Vest.

Vests shall be worn at all times when working in or around bus operating facilities or where traffic conditions exist.

22. Signs and Barricades

Will be used and maintained to warn and limit access to work areas. Red barricade tape will be used to flag high hazard work. No one is allowed to enter into a Red barricade without authorization from the Supervisor who erected the Red barricade.

23. Safety/ Health Inspections

Each contractor will continuously monitor their work areas for unsafe conditions and unsafe acts. Unsafe conditions will be corrected immediately and unsafe acts will not be tolerated.

24. Sanitation and Health

Employees are not to eat in the immediate construction area and a means of washing hands will be provided. A sanitary water supply will be provided and community cups are prohibited.

25. Safety Meetings

Each subcontractor will hold a minimum of (1) one Safety meeting with their respective employees weekly. All Safety meetings will be documented and kept onsite for review.

26. Security

The project will be secured to prevent easy access during non-working hours. Signs will be posted indicating a construction area with specific warnings that might be applicable. Use extreme security precautions around school projects and high exposure areas as malls and business complexes.

27. Emergency Response

Each subcontractor will have a First Aid kit onsite. Each subcontractor will have the names, phone numbers and locations of Emergency providers, i.e., doctor, hospital and the subcontractors designated company contact.

28. Competent Person designation

Each subcontractor will designate in writing their respective Competent Persons prior to start of work.

29. **Cell Phone Policy**

Cell phones will be used for business only while on WRL projects. Personal use will be restricted to breaks, lunch and emergency use only.

30. **Smoking Policy**

Use of tobacco is prohibited on any public school property as per State Penal Code 48.01 (a). All other WRL job sites are NO SMOKING within 25 feet of buildings or structures and smoking areas will be designated by the job Superintendent.

B. **SUBCONTRACTOR EQUIPMENT**

WRL requires all subcontractor equipment to be inspected and certified in safe operating condition before being placed in service. All subcontractors shall be furnished equipment inspection checklists. Subcontractor equipment includes all heavy equipment, cranes, man lifts, and other hoisting equipment.

The following subcontractors are exempt from equipment inspection requirements:

- Vendor equipment such as concrete trucks, delivery trucks, etc.
- Two-axle street legal vehicles such as pickup trucks.

Equipment inspections are to be conducted at the time the equipment is initially brought onto the project site. Inspections shall be repeated in the event of the following:

- The equipment is demobilized from the site.
- A repair or modification is made on the equipment.

The assigned equipment operator must conduct a safety inspection on all equipment prior to daily use.

These are minimal jobsite Safety, Health and Security requirements and in no way release the subcontractor from full compliance with all applicable Federal, State, Local, WRL and the contractor specific Safety, Health and Security Standards, Regulations and Rules. The governing Rule is the O.S.H.A. General Duty Clause that states; Employers will maintain their work areas 100% free of recognized hazards.