



## Table of Contents

SAFETY AND HEALTH POLICY .....	2
RESPONSIBILITY .....	2
INDIVIDUAL RESPONSIBILITIES .....	2
The President & Division Manager .....	2
Corporate Safety Manager .....	2
Project Leaders .....	3
Employees .....	4
Competent Person .....	4
WRITTEN SAFETY PROCEDURES.....	5
INSPECTIONS .....	5
HAZARD IDENTIFICATION.....	6
INTER-COMPANY COMMUNICATION .....	6
SAFETY COMMITTEE MEETING AGENDA.....	6
TRAINING AND EDUCATION .....	7
TRAINING COURSES .....	7
New Hire Training: .....	7
Specialized Training: (see Chapter A-9 for training recertification requirements).....	8
Annual Retraining Courses:.....	8
Supervisor/Project Leader Courses:.....	9
Informational On-Site Bulletin Board Postings.....	9
Safety Reporting & Meeting Minutes .....	9
CORRECTIVE ACTION.....	10
HEAT ILLNESS PREVENTION PROGRAM .....	11



## Safety and Health Policy

F.D. Thomas, Inc. (FDT) understands the importance of a safe and healthy work environment for our employees, subcontractors and others affected by our tasks. Our success to safety is our Injury and Illness Prevention Program (IIPP) which complies with all applicable OSHA standards and follows all generally accepted safety and industrial hygiene practices.

## Responsibility

By combining awareness of actual working conditions and challenges facing workers and project leaders with knowledge of governmental regulations and owner needs, FDT has developed an effective IIPP. Compliance with our IIPP insures that we place safety first in all that we do and on all of our jobs. Most importantly, every member of the FDT team is committed to safety. We believe that safety is an integral part of productivity.

## Individual Responsibilities

### The President & Division Manager

The President & Division Manager's are ultimately responsible for the safety and health of all employees of FDT to fulfill this responsibility, the President & Division Manager's will commit to:

- Providing the resources necessary to implement the safety and health program effectively.
- Communicating that all supervision or "project leaders" must be capable of implementing the safety & health program and receive ongoing education and training.
- Providing the resources necessary so that all project leaders are competent in the identification of existing hazards and have the authority to take prompt corrective action to eliminate them.
- Providing the resources so that all training, medical, inspection and accident records are provided and maintained.
- Arranging for periodic evaluation of this program at least annually.

### Corporate Safety Manager

The Corporate Safety Manager will be responsible for the following:

- To ensure that all project sites meet the requirements of the safety program and that site specific programs have been written and implemented.
- Serving as an advisor to the Project Leaders and Management.



- Coordinating, standardizing and maintaining the F.D. Thomas, Inc. safety program and policy development.
- Monitoring the implementation and enforcement of the Injury and Illness Prevention Program.
- Coordinating, standardizing and maintaining the F.D. Thomas, Inc. workers' compensation claims administration and Early Return-To-Work Program.
- Representing in the promulgation, changing or amending of regulations that govern construction safety and health, or workers compensation.
- Assisting Management during OSHA hearings, resolving OSHA fines, etc.
- Training Managers and Project Leaders, or other company staff regarding safety, health or workers compensation related issues.
- Maintaining safety files including training records, medical reports, inspection records and accident investigation records.
- Maintain an OSHA 300 log of all injuries and illnesses.

### Project Leaders

Project Leaders are responsible for the safety of their work crews and the areas they work in. To fulfill this responsibility, they are expected to:

- Recognize and evaluate the hazards of all work activities during pre-job planning.
- Determine the means for controlling hazards, as required by this program and OSHA standards.
- Routinely inspect work areas and equipment for hazards and deficiencies and take prompt action to eliminate them.
- Routinely observe the actions of their work crews for unsafe or non-compliant acts and take immediate action to prevent injury or illness and comply with program requirements.
- Conduct weekly safety meetings with their work crews, as educational and training sessions, and maintain records of meeting topics and attendance.
- Ensure that their workers are provided the proper tools, supplies, and equipment necessary for the job and ensure they are properly maintained.
- Ensure that approved personal protective equipment is provided to all affected employees, that this equipment is properly inspected, maintained, used, and that all affected employees are qualified to use this equipment.
- Ensure that their workers are provided with the training necessary to comply with OSHA standards and to perform their jobs safely.



- Conduct investigations of all accidents, injuries, illnesses, and near misses to accurately determine the causes and actions necessary for preventing future occurrences.
- Post the OSHA 300 log on each project site from February 1<sup>st</sup> through April 30<sup>th</sup> of each year.
- Ensure that the FDT code of safe practices is readily available on the jobsite.
- Comply with all sections of this program and all applicable OSHA standards.

### Employees

Every Employee is responsible for cooperating with their project leaders to ensure their own safety, the safety of their fellow workers, and the areas they work in.

To fulfill this responsibility, they will:

- Comply with all rules, OSHA regulations, and procedures that are part of this program.
- Attend and participate in all required training and meetings.
- Inspect all tools and equipment for defects and proper operation before use.
- Use all tools and equipment in a safe manner consistent with manufacturers' instructions.
- Consistently act in a safe manner, being constantly aware of their surroundings, work conditions, equipment operation, and activities of others.
- Immediately report all safety and health hazards to their project leader.
- Assist project leaders in accident investigations to ensure that unsafe acts and conditions are identified and proper corrective measures are implemented.

### Competent Person

FDT provides a competent person to oversee each project. The competent person may be the site project leader, foreman or project manager. The competent person has complete responsibility and authority to implement the portions of this safety and health program which are applicable to the project. The competent person reports directly to upper management. At painting projects involving the removal of potentially hazardous materials, the competent person is responsible for:

- Controlling access to the site and designating contaminated work zones.
- Overseeing air monitoring and ensuring the minimizing of emissions to air, water and soil.
- Verifying that engineering controls are functioning properly.



- Supervising employee exposure (air and biological) monitoring and employee notification.
- Ensuring Hazard communication training for all workers on-site.
- Ensuring workers have been issued and trained in the use of personal protective equipment.
- Ensuring workers have training in the types of exposure control methods.
- Ensuring workers have been trained in the use of personal hygiene facilities.
- Ensuring workers have been trained in decontamination practices.
- Documenting compliance with this safety and health program by completing forms appended to this program or any equivalent form which provides similar information.

### **Written Safety Procedures**

The F.D. Thomas, Inc., **Corporate Safety & Health Program** clearly defines proper policies, procedures and rules for preventing work related accidents, injuries and illnesses in compliance with OSHA regulations and specific standards for the specialty construction and painting industry. We are continuously refining our manual to stay current with changing regulations and practices. Every year, our President and Safety Manager review the manual for accuracy, content, completeness, and effectiveness. We have included a comprehensive review section that we use as a refresher for tailgate meetings and our annual employee training.

### **Inspections**

Every job site is inspected daily for compliance with all applicable regulations, standards, and policies. Weekly Job Site Inspections are documented and filed with the corporate safety department and included as part of the job file for each project. Job Site Safety Inspection Reports are filed and reviewed for non-compliance and effectiveness. We act upon these filings immediately to ensure that any issues detected are corrected expeditiously. Any critical safety issues will result in the immediate shutdown of the job site. Our Safety Manager and/or the On-Site Coordinators are authorized to shutdown any site deemed unsafe.

The Safety Manager performs periodic safety inspections. The Project Leader performs more frequent inspections. All near misses, incidents, accidents, injuries or illnesses are documented and investigated by the Safety Manager. By incorporating historical trends into our investigative and review processes, we are able to help prevent accidents and injuries making sure that past incident do not repeat themselves.

All employees are required to follow company and client safety rules and regulations as a condition of employment. Failure to do so results in appropriate disciplinary actions (verbal warning, written warnings, and termination).



### **Hazard Identification**

As a routine exercise, all tasks that will be performed by FDT are examined for hazards known to be part of our industry, including removal or installation of chemical products. These tasks are identified for the client and employees through **'Haz-Com Packages'**, which are assembled and provided to the client and the FDT Project Leader prior to the start of a job, regardless of the size of the project. MSDS, Pre-job Hazard Analysis, and Site-specific Safety Procedures are reviewed and used in conjunction with pre-job meetings to coordinate the overall effectiveness of each program.

As each project is inherently unique, we rely on the ability to communicate openly with the client and/or general contractor to review and modify policy and procedure to provide the best overall program possible.

### **Inter-Company Communication**

All FDT personnel are encouraged to participate with safety reports, suggestions and complaints. Each person on a crew is asked to lead a weekly toolbox meeting on a rotating basis, and will also frequently be requested to accompany a project leader on a site inspection. Our employees are involved with all aspects of our safety program and truly own our safety policies and procedures which helps ensure a high degree of compliance and cooperation.

Our Safety Committee is chaired by our Safety Manager and comprised of a small group of Project Managers, HR/Safety Administrators, Estimators, Site-Safety Coordinators and Field personnel. A monthly Safety Committee meeting is conducted at the Corporate Office by the Safety Manager; other divisions are contacted by conference call or by written monthly safety memo/safety newsletter reviewing incidents, current safety procedures and future issues that require information/input from the members of the Safety Committee. Our personnel travel extensively and this format of information exchange and safety procedure implementation has proven effective. Our meetings are documented and posted for the use of all employees.

All job sites have a posting of corporate officers to contact in event of an emergency, and all personnel are encouraged to contact any of those officers to lodge any type of a complaint, report or suggestion, especially if there is a safety issue involved. Their employment is secure in all reporting so long as legitimate and accurate facts are conveyed.

### **Safety Committee Meeting Agenda**

- Take Attendance
- Review minutes of last meeting and approve or amend
- Old Business – Go over any old business that needs attention (assigned tasks, unfinished business, information that needed clarification, etc.)
- New Business
- Go over monthly reports sent in by Project Leaders



- Go over Accidents, Incidents, and Near Misses (names removed so they can be sent to all projects)
- Make recommendations in order to prevent further same type accidents
- Discussion from the Committee
- Adjourn meeting – Set next meeting time and date

### **Training and Education**

Every employee and Project Leader is trained on all aspects of work at FDT. Before a new hire is assigned to the job, he/she is drug tested. Upon passing the test, our employees are trained extensively on specific policies and procedures necessary to complete work in a safe manner. Hazard Communication and Injury Prevention and Reporting are explained thoroughly and specifically on each project. All new hires receive an employee handbook and are instructed on the “FDT Basics” by video or book presentation.

On a weekly basis, each job site conducts a tailgate, or “toolbox”, safety meeting to reinforce the importance of safety with the entire crew. Project Leaders should document the training using the Safety Training Form (form A-9-a). Keeping safety at the forefront in our employees’ everyday work routine is a key to FDT’s outstanding safety record. Meeting minutes are recorded and filed at the job site and with corporate.

Training for safety, health, regulations, law, violence, relations, and quality is conducted at the FDT corporate office, satellite offices, job sites, union training facilities, and/or clients’ facilities by the FDT Safety Manager, FDT field safety coordinator, Union instructors and/or vendor personnel. These training materials are documented and reviewed periodically for updates.

Annually, FDT brings all of its supervisory personnel (field and corporate) together to attend team training on various subjects. The team provides much input during these sessions which is used to modify policies and procedures.

Many tasks that are part of our scope of work require specific certifications for workers and supervisors, such as Asbestos abatement, Lead abatement, Polyurethane Foam application, Confined Spaces, and special coatings systems. FDT personnel are trained in these tasks and receive certification through various accredited organizations.

### **Training Courses**

#### New Hire Training:

- Hazardous Communication Program
- Fall Protection Program
- Scaffolding Safety



- Respiratory Program
- Lock Out / Tag Out Program
- Ladders Safety
- Confined Space Program
- Blood Borne Pathogens Program
- Heat Illness Prevention
- Hearing Conservation Program

Specialized Training: (see Chapter A-9 for training recertification requirements)

- Bonding & Grounding
- Elevated Work Platforms
- Isocyanate & Spray Painting
- Powder Actuated Tools
- Conflict Resolution
- First Aid/CPR
- Boom Lift
- Mobile Scaffold Safety
- Drug Awareness in the Work Place
- Heat Illness Prevention
- Lead Abatement Safety
- Confined Space Entry
- Back Care & Safety
- Fork Lift Swing Stage Scaffolds
- Asbestos Removal
- Spray Paint Equipment
- Ergonomics for Construction
- OSHA 10 Hour Certification

Annual Retraining Courses:

- Respiratory Awareness
- First Aid / CPR - Every 2 yrs
- Competent Lead Supervisor
- Lead Awareness
- Hearing Conservation



- Heat Illness Prevention

Supervisor/Project Leader Courses:

- Controlling the Field – Job Site Safety Inspection / Job Site Safety Set Up.
- F.D. Thomas Incident Packet "T.I.P." – Incident Investigation / Reporting
- Drugs Awareness – Reasonable Suspicion / Documentation
- Competent Lead Supervisor Person
- Heat Illness Prevention Program (see Chapter B-01 for Policy)

Informational On-Site Bulletin Board Postings

- Federal Job Site Posting
- Emergency Job Site Information
- Assured Ground Color System
- State Job Site Postings
- OSHA 300 Log - Feb. 1 - April 30
- Safety Committee Minutes
- Dress/Behavior Posting

Safety Reporting & Meeting Minutes

- Weekly:
  - Toolbox Meetings
  - Site Reviews
    - Weekly Project Safety Report
    - Weekly Project Safety Walk Audit
- Monthly:
  - Safety Newsletter
  - Safety Committee Memo
  - Site Craft Meetings
  - Pre-task Analysis
- Quarterly:
  - FDT Newsletter Employee



## Corrective Action

The FDT IIPP and Drug and Alcohol policy require that all employees follow company policies and procedures. When needed, employees will be provided with additional training and information to maintain their knowledge and remain in compliance. FDT's corrective action process is intended to encourage employee compliance with all FDT policies and procedures.

Employees who violate any FDT policies will be subject to corrective action, up to and including immediate termination in situations where FDT, in our sole discretion, determines that termination is justified. We also reserve the right to involve law enforcement if we believe your conduct to be in violation of local, state, or federal laws.

If corrective action arises from a drug or alcohol problem, you may be required to participate in an approved drug and/or alcohol abuse assistance or rehabilitation program. See FDT's Drug and Alcohol policy for more information.

Although FDT reserves the right to discharge "at will", employees found performing work in an unsafe manner may be subject to immediate corrective action or termination by management. The Project Leader will determine the best course of action, which may or may not include progressive disciplinary steps. Progressive discipline may include, but is not limited to: verbal warning, written warning, and termination.

In cases where violation is serious or life threatening, the Project Leader reserves the right to immediately terminate and remove the employee without prior written warning.

## Progressive Discipline

- Step One - Verbal Warning – As the first step in correcting unacceptable behavior, the project leader shall review the pertinent facts with the employee. The project leader will consider the severity of the problem and the employee's past performance. A verbal warning may be issued to the employee. This warning and the name of the project leader will be documented and placed in the employee's personnel file. If necessary, the employee will be placed on probation. Violations will be removed from the employee's record after a six-month period.
- Step Two - Written Warning – If the unacceptable behavior continues, the next step will be a written warning. The written warning will clearly state the safety policy that was violated and steps the employee must take to correct the behavior. Probation will be a part of the written warning. It may also include time off without pay. At the completion of the probationary period, the project leader will meet with the employee to determine if the employee has achieved the required level of performance. This written warning,



which will include the name of the project leader, will be documented and placed in the employee's personnel file. Violations will be removed from the employee's record after a six-month period.

- Step Three - Termination – The employee may be terminated if he does not improve his behavior while on probation, or has violated another company safety policy within a twelve months period.

### Heat Illness Prevention Program

FDT strives to provide a safe and healthful working environment and protect FDT employees who are exposed to temperature extremes, radiant heat, humidity, or limited air movement while working from heat related illnesses.

Uncontrolled heat stress may cause conditions and illnesses, ranging from heat cramps and fainting, to heat exhaustion and heat stroke. Weakness, fatigue, dizziness, loss of coordination and fainting can lead to serious injury or death from falls. Project Leaders ensure that heat stress is controlled by providing an adequate supply of potable drinking water and ensure shade is readily available per safety standards at all job sites and insisting that periodic rest breaks be taken in cool areas where bodily fluids can be replenished. Breathable clothing can significantly aid in the evaporation of sweat that cools the body. Extreme caution is taken when workers are required to wear coveralls and protective clothing.

Project Leaders ensure that all their employees are trained on the causes, symptoms, first aid, and means for controlling heat stress. Training will be provided to all new hires and prior to job assignments to all employees. All Project Leaders will be trained prior to assignment to supervision of employees working in the heat.

The workplace will be evaluated to determine if F.D. Thomas' employees are at risk from heat related illnesses during temperature extremes and hot weather while working. If it is determined that employees are at risk they will be trained to be aware of heat related illnesses, how to prevent heat related illnesses, the symptoms of heat related illnesses and procedures to take if symptoms are present.

FDT will implement this Heat Illness Prevention Program when employees are at risk of heat related illness while they are working and are exposed to a combination of environmental risk factors such as temperature extremes, radiant heat, humidity, limited air movement, protective clothing, workload severity and duration.

FDT will address how we will reduce the potential for heat stress to occur in the Heat Illness Prevention Site Specific Plan located in the HazCom Binder.