



Subcontractor Safety and Health Manual

Responsibility: The Project Manager will ensure that upon prior to awarding a contract to a subcontractor, the subcontractor shall receive a copy of the Subcontractor Safety and Health Manual.

Who's Affected: All subcontractors

Purpose: To notify subcontractors prior to starting work of the WEHR- specific and OSHA safety requirements for the project. It is the subcontractor's responsibility to hold their subs accountable for maintaining a hazard-free worksite and contribute to protecting the safety and health to all parties involved on WEHR projects.

Steps for Implementation: Once Subcontractors have reviewed all the materials and information given by the Project Manager; a Subcontractor Orientation/ Pre-Construction Meeting shall be held to answer any subcontractor's questions. Once all questions have been answered, the subcontractor's supervisor will sign the commitment to safety sheet and return it to the Project Site Manager; it will be filed at the project office.

The subcontractor's employees will view the Safety Orientation video; they will be tested on the materials covered, then required to sign the orientation sign-off sheet. The sign-off sheets will be kept on file by Wehr Constructors.



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NOTICE

I. It is the responsibility of all subcontractors to become familiar with all OSHA and or any other State, Local, Municipal, and Owner directed regulations that may apply to the work to be performed by the subcontractor. Ignorance of any of these regulations will be no excuse for non-compliance.

The Subcontractor is responsible for having their own written safety program that covers safety and health issues for the entire scope of work performed by the subcontractor. A copy of the subcontractor's written safety program shall be kept on site during work and be subject to review by Wehr. Failure to comply will subject the subcontractor to disciplinary action up to and including termination of the subcontract. Wehr reserves the right to make changes to policy without prior notice. These changes will be at least as stringent as Federal, State, and Local law requires.

Many of these obligations are clarifications of OSHA requirements, however Wehr strives to provide the Safest working environment possible for all parties on a Wehr site and recommend that some regulations are exceeded.

Here are the major areas where Wehr recommends OSHA requirements are exceeded:

- There may be additional site-specific requirements that will be covered during site orientation
- Eye and face protection should always wear when exposed to any possible physical damage such as grinding, chipping, cutting or splashing, i.e., concrete work.
- Hard Hats Wehr require hard hats 100% of the time—Unless the Wehr Superintendent and Wehr Safety Manager determines all overhead hazards are eliminated.
- Safety Representatives and Designated Safety Representatives
- Job Safety Analysis (JSA's)
- 6' Trigger Height for all Fall Protection- A universal 6' trigger height for fall protection exceeds OSHA standards
- The prohibition of aluminum ladders or manufactured wood ladders
- Requirement to have all excavations barricaded
- Requirement to have a Certified Crane Operator (NCCCO, NCCCER, or OECP. CIC Certification accepted if certification was obtained prior to 12-2-19)
- Third party, post-assembly crane inspections on cranes that require on site assembly
- 20' approach distance to over-head power lines
- High-visibility shirt/vest required when working on new equipment, or next to a roadway.
- Headphone and earbud use prohibited inside construction site
- The use of personal radios / speakers will be prohibited from use on our sites
- Safety toe work boots shall be worn by all employees
- Spotters shall be used when in congested areas, moving mobile equipment, working next to installed equipment and when any overhead work is being performed (if no barricade is in place). Reference section 25 of this manual for spotter requirements.
- Ladders last policy: ladders shall be used as a last resort on the project. Reference section 32 of this manual pertaining to the requirements of ladders.





- Overhead Work must have an enclosed barricade or spotter in place prior to starting overhead work. Reference section 25 of this manual for spotter requirements.
- Carbon Monoxide Awareness

If you are selected to work on this project, you and your safety representative will attend a pre-construction meeting to review the material in this manual and discuss any questions your company may have.

Prior to contractors starting work on the project, your company is required to train your employees on all safety requirements in this manual and those required by OSHA, as well as all other state, federal, or local regulations.



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Safety Expectations

Minimum of a one (1) day suspension shall be given to any employee who is observed violating any one of the following Safety Expectations. These violations are:

- Flagrant disregard for Personal Protective Equipment (PPE)
- Noncompliance with Fall Protection Rules
- Working in an energized panel without appropriate PPE
- Unauthorized confined space entry
- Entering a controlled access zone w/o authorization
- Not reporting an incident in a timely manner
- Not complying with any of the Ground Disturbance Guidelines

Additionally, any employee exhibiting a flagrant or willful disregard for safety, subcontractors, or vendors, that could cause death, serious injury, or property damage may be <u>immediately removed from the project</u>.

Other Safety Violations

All other Safety Violations observed shall be managed according to the procedures established below:

- <u>First offense by an employee</u> Any Wehr team member observing a safety violation will verbally notify the employee's immediate supervisor of the violation and will request assistance. The verbal warning will be logged with the Safety Representative.
- <u>Second Offense (same employee)</u>
 Upon a second safety violation, a written report or warning will be filed with the onsite supervisor of the Subcontractor. The Site Manager/Safety Representative will require a meeting with the employee and the supervisor. During this meeting, a Counseling Sheet will be completed and signed by everyone present.
- <u>Third Offense (same employee)</u> Three (3) safety violations by the same employee will result in his/her dismissal from the jobsite.
- <u>Isolated Incident</u> Wehr Constructors can remove any employee on site if it is deemed necessary.

General Guidelines

- All site employees shall use and wear appropriate fall protection when exposed to falls greater than six (6') feet above a lower level and when working from aerial/scissor lift.
- Possession of or working under the influence of alcohol or drugs is prohibited.
- All temporary electrical equipment, including all connected by extension cords, shall be protected by Ground Fault Circuit Interrupters (GFCI).
- Be alert always and report all unsafe conditions or acts, along with all accidents and near misses to your supervisor immediately. A near miss is defined as, "an unplanned event that did not result in injury, illness, or damage, but if conditions were slightly different, had the potential to do so."
- Proper work attire shall always be worn. This includes at a minimum: 3" sleeves; leather, safety-toe work boots; and long pants.





- Use of personal protective equipment such as hard hats, safety glasses/goggles, high-viz shirts/vests, safety toed work boots, and gloves are mandatory when the need arises.
- "Horseplay" and other such unsafe acts are prohibited.
- Fire protection equipment is not to be tampered with or removed from its assigned location. Tampering with fire equipment is prohibited and may be grounds for termination.
- Prior to work beginning, all site employees are to visually inspect all hand tools and extension cords they will be using. Tools and extension cords that are found to be defective are to be tagged, taken out of service, and removed from the site or repaired immediately.

General Guidelines Continued

- Scaffolding shall be inspected for any defects by the subcontractor's competent person prior to each work shift. If
 scaffolding is found to be incomplete or defective, it is to be immediately brought to the attention of the supervisor
 and tagged out of service until repairs are made or issues corrected and re-inspected by the competent person.
- Only authorized and properly instructed/trained/qualified site employees shall operate machinery equipment, vehicles, or tools.
- Vehicles are always to be operated in a safe manner by no one other than a trained and/or certified equipment operator.
- Utilize proper lifting techniques. Do not try to lift or push objects that are 50 lbs. or more. Get help if necessary.
- Do not enter barricaded areas unless authorized to do so.
- Modification or alteration of any piece of personal protective equipment is strictly prohibited.
- Defective or damaged personal protective equipment shall be removed from the site or repaired immediately.
- "No Smoking" rules shall be obeyed in posted areas.
- A formal, written plan for bracing will be required for the bracing of tilt-up and pre-cast panels, masonry walls, and steel erection activities. Further requirements of these plans may be found under the "Scope of Work" section of your contract.
- The use of plastic fuel cans is prohibited.
- Contractors are required to perform housekeeping daily to keep all garbage and debris out of the work areas.
- Mentoring Program guidelines will be followed.



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Subcontractor Safety and Health Policies

1. Alcohol and Drug Free Policy

Attached is a summary of Wehr Constructors Drug-Free Workplace Policy & Procedures (DFWPP") Attachment #6 Upon request, Wehr will provide an electronic or hard copy of our full DFWPP. The subcontractor shall establish written procedures for compliance with Wehr. DFWPP and agrees they will implement and enforce the policy throughout the course of the project. Additionally, the subcontractor agrees to follow all customer, state, local, and federal regulation regarding drug testing.

2. Orientation

All subcontractors, tiered contractors, vendors, suppliers, and other personnel entering the project shall go through the Wehr Job specific orientation process prior to being allowed on site. Subcontractors shall ensure all visitors and vendors sign in with Wehr prior to accessing the site. Subcontractors shall ensure all their visitors, vendors, suppliers, and tiered contractors are supplied with all required PPE prior to accessing site.

3. Workers with Disabilities

Construction projects keep communities moving forward. Still, construction poses serious safety concerns and risks of injury to workers and pedestrians, and it can create unique safety risks and concerns for those with medical conditions that may otherwise create additional limitations of their ability to perform their job safely. With Wehr and its contractors remaining vigilant and understanding the need to identify and proactively address safety risks and concerns that are prevalent on construction projects, regardless of a workers physical limitations, we can mitigate the risks of a construction-related accident or injury for all individuals on a construction site, and provide reasonable accommodations to those with disabilities as defined by the American with Disability Act (ADA) without creating and hopefully mitigating any additional safety risks of accident or injury. For additional information, please see Attachment #7.

4. Fatigue Management

Employee fatigue can present risk to the safety, health, and productivity. Please be aware that if your workforce falls under any of the following guidelines, your company will be required to develop a Fatigue Management Program, which will educate the worker, set guidelines for management, and controls that will reduce the risks of incidents due to repetitive days of long hours without proper time for the worker to rest.

Guideline for Fatigue Management Plan development:

- Workers that exceed work hours of 10 hours a day for more than 5 days a week
- Exceed 60 hours in a 7-day work week
- Exceed 12 hours a day for more than 3 consecutive days
- Any contractor that works a night shift will educate their workers in fatigue management

5. Project Safety Plan

Subcontractors must identify rules and regulations applicable to them and train employees according to these rules and regulations. Not only does Wehr intend to keep the jobsite safe, but we also have the responsibility to keep the owners out of harm's way as well.

Examples of customer specific requirements can include, but are not limited to:

- Client Specific Orientation Procedures
- Prohibitions against cameras and other recording devices including cell phones



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- Permitting Procedures/Policies (Hot Work, Confined Space, Roof Access, etc.)
- **Emergency Evacuation Procedures/Policies**
- Incident Notification Protocols
- Special PPE requirements

6. Injuries/Incidents/Near Misses

All incidents resulting in physical injuries or property damage, involving the public or visitors, and any near misses where there is the potential for injury and /or property damage, shall be reported to Wehr at the time of occurrence by the contractor in charge of the worker(s) / work. A near miss is defined as, "an unplanned event that did not result in injury, illness, or damage, but if conditions were slightly different, had the potential to do so. The Wehr Safety Manager shall ensure that the following reporting procedures are followed by all subcontractors: all injuries, property damages, and near misses must be reported, regardless of severity. Notification of an incident must be delivered to Wehr within 10 minutes of occurrence. In the event an employee must leave site for further medical evaluation Wehr should be notified prior to the injured employee leaving the site. A completed investigation report with witness statements and photographs is to be completed and delivered to Wehr within 24 hours of the incident.

7. First Aid/CPR/Bloodborne Pathogens

It is the intent of this policy to ensure that any employee injured on our site receive an initial medical response within 4 minutes of an injury. Each subcontractor shall have at least one current CPR/First Aid trained employee on site during all work activities. Any First Aid responders will also be trained in Bloodborne Pathogens (BBP). The employer will have an appropriate number of First Aid Responders on site based on the size and scope of their work. Subcontractors are required to have a First Aid kit, as well as a BBP response kit appropriate to the number of employees the contractor is responsible for. Copies of wallet cards or other acceptable means identifying CPR/First Aid Responders shall be on file in the Wehr site office. Any employee trained in First Aid and BBP must be singularly identified by some obvious means.

- In the event of an incident that could expose employees or equipment to potential exposure of bloodborne pathogens, the following steps will be taken only by those who have proper and up to date Bloodborne Pathogen Training:
 - Immediately clean and disinfect any visible surface contamination from blood, vomit, or other body fluids. 0
 - 0 All personnel involved in the decontamination process will use appropriate bloodborne pathogens kit and PPE included in the kit.
 - An EPA registered disinfectant suitable to treat contamination/spills and to disinfect surfaces or a 1:10 solution of 0 bleach to water will be used to disinfect all contaminated surfaces.
 - All materials used to clean will be disposed of according to the guidelines set forth by the OSHA requirements for 0 the cleaning and decontamination of bloodborne pathogens 29 CFR 1910.1030. Any chemicals to be used should also be used in compliance with OSHA's Hazard Communication Standard 29 CFR 1910.1200.

8. Safety Representative

Although every employee on our site is responsible for safety, each contractor will appoint a Safety Representative. The Safety Representative is responsible to support and coordinate with the compliance of safety rules and regulations outlined in the Project Safety Plan.

- The Safety Representative may have other duties assigned to him in addition to duties of safety oversight and administration. If a contractor is working two or more shifts, a separate Safety Representative shall be assigned to each shift and must remain onsite for the duration of work activities.
- Safety Representatives must hold an OSHA 30 Hour Card issued in the past 10 years.



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In certain instances, we may require contractors to provide a "Designated" Safety Representative (DSR). The DSRs shall have no other duties other than the enforcement and administration of the Site Safety and Health Plan.

A DSR shall be required when:

- A subcontractor has 20 or more employees on the same shift at the site.
- A subcontractor's safety performance is deemed unacceptable.
- The subcontractor is performing "high-risk" work activity as identified by Wehr.
- A copy of the Designated Safety Representative's resume shall be provided to Wehr at the time of the contractor's preconstruction meeting.
- Wehr reserves the right to disqualify any subcontractor's Safety Representative based on the review of their resume or performance.
- The contractor's DSR shall provide Wehr with monthly documentation of any and all safety non-compliances they have found during their daily inspections. This documentation can be in the form of an email, pictures, formal audit, etc.
- Wehr will also conduct monthly audits, once the audit is sent to the DSR they shall insure actions are being taken to fix the citation. One the citation is corrected it should be sent back to the Wehr Safety Manager.

9. Competent Person Designation

All contractors and subcontractors on the project will designate a "Competent Person" as described by OSHA 29 CFR 1926 Safety Standards for the Construction Industry. A "Competent Person Acknowledgement Form" will be completed for each subcontractor's competent person. In addition, any documentation supporting the competent person designation shall also be provided to Wehr prior to the start of work on the project. If there is a change in competent persons, this form must be updated and resubmitted to Wehr prior to the new competent person accessing the jobsite.

A "Competent Person" is defined as, "One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authority to take prompt corrective measures to eliminate them."

Competent Persons Designation will include but are not limited to the following areas: Fall Protection, Scaffolding, Cranes / Rigging, Ladders, Tilt Panel Operations, Electrical, Confine Space Entry, Trenching / Excavating, Steel Erection, and Respiratory Protection.

10. Weekly Safety Meetings

Each subcontractor shall have their appointed representative at all Wehr safety meetings and must have at least one weekly safety meeting with their employees. In addition, a copy of the notes from the subcontractor's employee meeting must be turned in to Wehr

11. Emergency Action Plan

All employees must be made aware of the elements included in each job site Emergency Action Plan.

- An emergency is any situation that poses an immediate threat to life (workers, visitors, general public) or property. This would include, but not be limited to: fire, explosion, flooding, equipment failure (i.e. collapse of a crane), release of toxic gases, dusts, fumes, smoke, natural gas, injuries and/or property damage, a weather emergency, etc.
- A site-specific Emergency Action Plan will be covered during site orientation.
- A written copy of the site-specific Emergency Action Plan will be posted in the Wehr trailer and made available to all contractors on site.

Contractors are responsible to make their employees aware of all policies and procedures within this plan. The Emergency Action Plan will include elements such as:

• Where to report to in case of a fire



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- Where to take shelter in the case of a tornado warning
- How site workers will be made aware of these hazards
- Although Wehr will develop a Site-Specific Emergency Action Plan, OSHA requires each employer to develop, maintain, and update as necessary their own Emergency Action Plan. If the plan developed by your company deviates from the provided Emergency Action Plan you must notify Wehr of any differences between your plan and the provided Emergency Action Plan.

12. Hazardous Communication Policies

A copy of the Subcontractor's Hazard Communication Program must be maintained on site along with all Safety Data Sheets (SDS) for chemicals present on the project. The subcontractor must train its employees on its policy.

Hazardous Materials

- Contractors shall submit all HAZCOM manuals, along with SDS for all chemicals only used on site with a site-specific index. A copy of all HAZCOM programs and Safety Data Sheets shall be centrally located in the Jobsite Trailer or in Wehr Drop Box
- Contractors using hazardous materials on site must alert other contractors of the potential hazards associated with the materials they are using.
- Hazardous materials must be transported in approved containers and be properly labeled.
- When working with or around hazardous materials, site employees are to be aware of signs of overexposure, such as
 dizziness, nausea, trouble breathing, etc. If overexposure occurs, immediately remove yourself from the area and notify a
 supervisor.

13. Dress Code

- Shirts w/ 3" sleeves; long pants; and leather, safety-toe, above the ankle work boots are required.
- Clothes must be in good condition. Loose or ragged clothing, which may become a hazard around moving equipment or catch fire easily is prohibited.
- Safety-toe work boots are to come above the ankle and be constructed of leather or other strong durable material and be in good condition. Canvas shoes, sandals, or open-toed shoes are prohibited. Waterproof rubber boots may be worn when conditions require them.
- High-visibility clothing is required during out-door sites and must be worn on the outer-most layer. At a minimum, employees are required to wear bright green/bright orange shirts. There are certain circumstances where a greater class of high-visibility clothing is required, such as roadwork or owner requirements.
- For work in non-daylight hours, high-visibility jacket or vest with reflective material that meet at a minimum, the ANSI Class II requirements shall be worn.

14. Fire Protection/Prevention

- Fire extinguishers will be located within 25 feet of all flammable/combustible liquids.
- Fire extinguishers shall be readily accessible to all work activities on the site.
- Any contractor responsible for fire watch activities must ensure their employees are trained in fire extinguisher use.
- The contractor is responsible for providing their own fire extinguishers where work activities warrant them.
- All mobile equipment shall be equipped with fire extinguishers.

15. Lighting and Illumination

- Temporary lights shall be equipped with guards to prevent accidental contact with the bulb. Guards are not required when the construction of the reflector is such that the bulb is deeply recessed.
- All temporary lighting must be on a dedicated circuit.





16. Confined Space Entry

- All confined space work shall be done within the scope of 1926.1200 (Subpart AA).
- All permit required confined spaces shall be identified with a "Permit Required Confined Space" as they are constructed/arrive on site.
- Wehr shall be provided a written copy of all information obtained by the contractor regarding any confined space. These written materials will be available on site and made aware to any and all contractors that may enter confined spaces.
- Wehr shall be notified prior to any contractor allowing employees to perform work in a confined space.
- A confined space is any space which is: 1) Large enough and so configured that an individual can bodily enter and perform assigned work; 2) Has limited or restricted means of entry or exit; and 3) Is not designed for continuous employee occupancy.
- Confined spaces may include but are not limited to: Boilers, Manholes, Tank Cars, Pits, Vaults, Wells, Tunnels, Sewers, Cisterns, Furnaces, Diked Areas, Silos, Septic Tanks, Pumping Stations, Storage Bins, Hoppers, and Vessels.
- Hazards found in confined spaces may include but are not limited to: oxygen deficient or oxygen enriched atmospheres, combustible/flammable/explosive gases and vapors, toxic gases or vapors, combustible dust, engulfment hazards, entrapment or configuration hazards, mechanical hazards, corrosive chemicals, electrical, and temperature extremes.
- Employees shall not enter any confined space (i.e. manholes, equipment vaults, and underpinning operations) unless it has been tested for oxygen content, absence of flammable and/or toxic vapors, and all other potential hazards.

17. Anti-Harassment Policies

Wehr is committed to maintaining a harassment-free work environment. To fulfill this commitment, Wehr prohibits harassment of its team members or applicants based on a person's race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, amnesty, or status as a covered veteran in accordance with applicable federal, state and local laws, or any other trait protected by law. Contractors are required to comply with the requirements of the Anti-Harassment policy contained in Wehr Safety Manual.

18. Workplace Violence

Wehr is committed to maintaining a workplace free from acts or threats of violence. If violent acts or threats occur, Wehr will respond to mitigate the situation. To this end Wehr seeks to provide a safe work environment to the full extent of the law. This statement shall not be construed to create an obligation on the part of Wehr to act beyond what is required by law. Contractors are required to comply with the requirements of the Workplace policy contained in Wehr Safety Manual.

19. Job Safety Analysis (JSA)

The subcontractor will be required to complete a Job Safety Analysis (JSA) for each specific work activity. Each employee will sign and understand the JSA prior to work beginning. The JSA shall be available in the activity for affected employees to view and sign. At the end of each day, or upon completion of the activity, employees are required to sign out of the task saying that they are leaving that task incident and injury free. The JSA will then be given to Wehr for review.

• Blank task specific JSA's shall be available at the Wehr Jobsite Trailer. Photo copying of a completed JSA is prohibited. *See Attachment #1*

20. Daily Job Site Inspection

Inspection of the work area is the responsibility of each subcontractor's Supervisor or Safety Representative. Any potential unsafe issues identified by the subcontractor must be brought to the attention of Wehr prior to beginning work that may jeopardize the safety of anyone on site.



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21. Operator's Qualification Record

Operators of heavy equipment shall be qualified. Equipment-specific documentation of each operator's qualification must be turned-in to Wehr prior to work beginning. Subcontractors may be asked to turn in a duplicate key for equipment.

- Operators shall inspect vehicles and equipment for defects at the beginning of each shift. Defective vehicles or equipment shall not be used.
- Drivers and operators of vehicles and equipment shall strictly observe speed limit restrictions and all posted traffic control signs.
- Vehicles and equipment with a restricted view to the rear, and required to move in that direction, shall be equipped with an operable backup alarm, which is audible above surrounding work noise levels.
- Blades and buckets of earth-moving equipment shall be lowered to the ground when unattended and at the end of the workday.
- Engines shall be shut down during refueling operations.
- Running equipment shall not be left unattended.
- In congested or critical areas, a spotter shall be required when the equipment is moving.
- If the situation dictates, multiple spotters shall be required. *See section #27 for additional requirements on Spotters.

22. Hot Work Permits

A Hot Work permit shall be required for all spark-producing work activities taking place within an existing structure and/or when required by the customer. Hot work is any work that involves burning, welding, using fire- or spark-producing tools, or that produces a source of ignition. When performing hot work, the following welding/cutting guidelines shall be followed:

- Work area shall be inspected for flammable solvents, vapors and gases.
- Flammable and combustible materials shall be removed or covered.
- Appropriate fire extinguishing equipment shall be immediately available in the work area.
- A fire watch will be posted during welding/cutting operations for one-half hour following these operations when conditions make it appropriate. The fire watch will be instructed as per the requirements set forth in OSHA Regulation 1926.352(e) describing the duties of a fire watch.
- When the building is 75% completed/enclosed a Hot Work Permit is required when hot work is taking place inside or within 25 feet of building.

See Attachment #2 Hot Work Permit

23. Floor and Wall Openings

- When employees are exposed to overhead hazards, contractors shall ensure the area is properly barricaded to restrict traffic in and out of the area. Toe boards, screens, or guardrail systems shall be erected to prevent objects and materials from falling onto lower levels.
- A "hole" is a gap or void 2 inches or more in its least dimension, in a floor, roof, or other walking/working surface.
- All covers shall meet the elements set forth in 1926.502(i).
 - All covers shall be color coded or they shall be marked with the word "HOLE" or "COVER" to provide warning of the hazard.
- An "opening" is a gap or void 30 inches or more high and 18 inches or more wide in a wall, partition, vertical walking working surface, or similar surface through which employees can fall to a lower level.
- All wall openings shall be guarded as set forth in 1926.501.
- Self-retracting lifelines (SRL) shall be required for fall protection in all aerial and scissor lifts.

24. Fall Protection Policy

Following requirements regarding Fall Protection.100% COMPLIANCE with ALL FALL PROTECTION Regulations. Wehr enforces a 6' trigger height for all work. Subcontractors are responsible for ensuring their employees are made aware of and for enforcing



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these policies. There will be Zero Tolerance for violations of Wehr Fall Protection Policies. Subcontractors found in violation of fall protection policies may be removed from the site.

Fall Protection

- 100% Compliance with fall protection rules when employees are working at heights more than 6 feet and/or when working from aerial/scissor lifts.
- PFAS must always be worn when working in a aerial Lift.
- Fall Protection Violations: ZERO TOLERANCE WHICH MAY INCLUDE REMOVAL FROM THE PROJECT!!
- All fall protection components are to be inspected daily/prior to every use. DO NOT USE DAMAGED or WORN-OUT COMPONENTS.
- Anchorage points must be rated for 5,000LBS per person.
- All fall protection equipment shall be used properly based on OSHA and manufacturer guidelines.
- When a contractor believes their work falls outside of standard fall protection practices, the subcontractor may submit a
 written alternate fall protection plan to Wehr for review. No work that deviates from standard fall protection practices may
 be conducted until a meeting has been held with Wehr.

Warning Line(s)

Warning lines shall be established and maintained by subcontractor(s) conducting work when there is a potential to fall to a lower level.

- Roofers shall maintain a warning line at 6 feet unless mechanical equipment is present, then that line shall be extended to 10 feet.
- A warning line shall be established at 15 feet for non-roofers that may be present on the roof.

25. Aerial / Scissor Lifts

- Contractors shall perform and document daily/pre-shift inspections of all lifts.
- Only authorized and properly trained personnel may operate aerial and scissor lifts.
- Lifts shall be used on surfaces that will fully support them.
- Lifts shall only be operated on level surfaces.
- Dead-man type safety switches and controls shall not be bypassed.
- Lifts shall be kept at least 20 feet from energized, overhead power-distribution lines.
- When lifts may be exposed to other electrical hazards such as cable trays, electrical service, switchboards, panelboards, circuit panels, the K tables in Subpart K of the 1926 standards must be followed. At no time may any lift be closer than 3' to any energized piece of equipment.
- Employees using lifts must always wear approved fall protection equipment and attach the lanyard to the engineered anchorage point.
- Employees shall perform all work from lifts with both feet on the floor of the basket. No employees shall be permitted to perform work from the toe board, mid-rail, or top rail of a lift.
- On-site modifications to lifts are prohibited.
- All attachments must be engineered and designed for the type of lift it is to be attached to.
- Barricade and/or spotter shall be used in the area where overhead work is taking place.
- All manufacturers' requirements shall be followed.
- Aerial lifts shall not be operated when high winds could affect the equipment's safe operation. Please refer to the manufacture's guidelines for further detail.
- Fall protection is required in both scissor lifts and aerial lifts.
- Tool tethering may be required based on where the work is taking place.
- Self-retracting lifelines (SRL) shall be required for fall protection in all aerial and scissor lifts.





26. Spotters

- The spotter(s) shall be competent and trained on the job site.
- The spotter(s) and operator shall have a pre-movement review of the line of travel. The discussion will allow all parties to identify potential hazards along the way.
- A spotter is necessary when the driver or operator does not have a full view of the travel path or when a piece of equipment is carrying materials in or out of a building.
- Spotter and driver will maintain visual contact at all time while the vehicle is moving forward or backward.
- The operator will stop immediately if he/she loses sight of the spotter(s).
- The spotter(s) will not have any additional duties while they are acting as the spotter(s).
- The spotter(s) will not use personal mobile phones, headphones, or other items that can cause a distraction while performing their duties.
- If necessary, the spotter may be required to wear a different colored hard hat or vest to be identifiable to operator/jobsite employees.
- In addition to congested areas, spotter(s) will be required when within 10 feet of installed owners' equipment, specialized equipment, installed equipment (ground level), near structures, or when deemed necessary by the Wehr site team.
- Two spotters shall be required when equipment is traveling in and out of doorways and or entry ways.
- Spotters shall remain visible to all other trade traffic during duties. If not, a second spotter shall be in place to divert other trade foot/equipment traffic.

27. Hand Tools

- Wooden handles on tools shall be free of cracks or other defects. Tape or other coverings shall not be placed on handles.
- Impact surfaces of tools shall be free of mushroomed surfaces.
- Wrenches with sprung or worn jaws shall not be used.
- All defective tools must be immediately removed from the site.

28. Phone Use

The use of radios and earbuds are prohibited on Wehr Projects while actively performing or in proximity of construction activities and maneuvering the project site.

The use of cell phones either work or personal will be allowed on a limited basis

- If the use of a phone is necessary, you must move to a safe area, clear of any work activity prior to utilizing the phone.
- Under no circumstances shall employees be on their phone while performing a construction activity or while walking on site.
- NO PHONE USE WHILE OPERATING EQUIPTMENT
- The use of technology in the form of a tablet, I-pad or phone for inspection or auditing of the work is acceptable, but the user must establish themselves in a safe location.

29. Head Protection

- Hard hats shall meet the specifications contained in American National Standards Institute, Z89.1-1969, Safety Requirements for Industrial Head Protection.
- Hard hats are always required by all personnel on Wehr sites.



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- Hard hats for the protection of employees exposed to high voltage electrical shock and burns shall meet the specifications contained in American National Standards Institute, Z89.2-1971.
- Helmet style head protection meeting both Z-89 and EN12492 will be required for all elevated work starting July 6, 2020. Effective January 1, 2021, Helmet style head protection will be required by anyone on a Wehr jobsite.
- Metal hard hats shall not be worn.
- Hard hats should be worn with the visor (bill) facing forward.
- When additional face protection is needed, it must be worn in conjunction with the hard hat.

30. Tools & Equipment

- Employees shall inspect tools and equipment for defects. Defective tools and equipment shall be tagged as defective and removed from the job site until repaired or replaced.
- Guards and safety devices shall be left in place and in operable condition on all tools. Any tools or equipment with missing or defective guards are prohibited.
- The employer is responsible for all tools brought on site by their employees.
- PPE must be always worn when using power tools

31. Stairways

- Except during stairway construction, foot traffic is prohibited on stairways with pan stairs unless the pans are filled with wood or other solid material to at least the top of the pan.
- Temporary stairways will be kept clear of debris and allow for easy egress.
- A stair tower shall be provided at a minimum when:
 - The building is 20 feet or higher in height.
 - The roof area of the building is 20,000 square feet or more.
 - \circ $\;$ If you have multiple trades accessing the roof in addition to the decking sub or roofer.
- Toe boards or barricades must be provided, at a minimum.
- Each stair tower is required to be tagged for daily inspection.

32. Ladders

Ladders Last

This policy is implemented to ensure that contractors are exhausting all available resources to avoid the use of step ladders, extension ladders, and job-made ladders to access elevated work areas. I This policy will not affect the access/egress for excavations.

Examples of alternative means of access are: Aerial/Scissor Lifts, Scaffolds, and Stairways.

- Ladders shall be inspected prior to use. Defective ladders shall be tagged as defective and removed from the jobsite.
- Manufactured wood ladders, aluminum step ladders, and extension ladders are prohibited.
- Ladders shall be placed on a sound footing and shall not be placed on unstable objects such as loose bricks.
- Employees shall not carry tools, materials, or objects while climbing ladders.
- Extension ladders shall be secured at the top. Ladders not in use should be removed from the vertical position.
- A-frame ladders shall be secured from displacement if side loading can occur, or employee cannot maintain three points of contact.
- Ladders must be placed at an angle not to exceed one foot of run for every four feet of rise.
- Extension ladders must extend 42" above the landing when used for access/egress.
- When used as semi-permanent access, the top and bottom of an extension ladder must be secured.





- Any employee working from a ladder must keep the core of their body inside the frame of the ladder. There may be specific work scenarios where employees will be required to wear personal fall protection systems while working from a ladder.
- Job-made wooden ladders are allowed when they meet the requirements sets forth in CFR 1926.1053. However, the side rail shall extend 42" above the landing when used for access/egress.
- Required to have legible stickers with manufacturer's ratings and instructions.

Step Ladders

- Employees shall not work from the top two rungs of step ladders.
- Step ladders shall only be used in the open and locked position.
- Required to have legible stickers with manufacturer's ratings and instructions.

33. Scaffolds

- Contractors shall provide a competent person to perform daily/pre-shift inspections whenever scaffolds are being utilized.
- Scaffold systems shall be erected and maintained based on the regulations set forth in 1926 Subpart L, as well as manufacturer's guidelines.
- "Hooches" shall not be attached directly to scaffold components.
- Any employee working on a scaffold 10' or greater shall be protected against falls by guardrails or a personal fall arrest system.
- Employees responsible for the erection or dismantling of scaffold shall be protected from falls 6' or greater by either guardrails or personal fall arrest systems when feasible.
- Baker/Perry scaffold shall have guardrails attached when pic boards are set at 6' or greater and shall follow all manufacturers' requirements.
- Barker/Roiling scaffolds should not be in stair ways
- Only competent scaffold builders are to erect or modify scaffolding.

34. Respiratory Protection

- Employers requiring their employees to wear respirators, including dust masks, shall submit a copy of their written Respiratory Program, as well as documentation naming all employees qualified to wear a respirator based on a medical evaluation and fit test. Further documentation may be requested.
- Reference OSHA's Appendix D.

35. Eye and Face Protection

- Eye and face protection equipment shall meet the requirements specified in American National Standards Institute, Z87.1-2015.
- For some tasks, safety glasses do not provide adequate protection. Contractors shall evaluate potential hazards associated with specific tasks and establish minimum acceptable protection for those tasks. Some examples are insulation work, sandblasting, catalyst handling, some woodworking tools, powder-actuated tools, impact wrenches, handling chemicals, grinding, chipping, concrete breaking, high pressure air or water blasting or cleaning, opening process lines or systems, battery charging and jump starting, welding, burning, and cutting. Examples of additional protection are: mono goggles, chemical splash goggles, burning and welding goggles, face shields, welding hoods, with appropriate filters and sandblasting hoods.



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- Eye and face protection SHALL be worn at all times where exposed to any possible physical damage such as grinding, chipping, cutting or splashing, i.e. concrete work.
- When building is enclosed 75% clear glasses or indoor/outdoor glasses are to be worn. Dark glasses are to be worn only when outside.

36. Air Tools And Hoses

- Attachments shall be secured to tools by proper retainers.
- Tools shall not be hoisted or carried by their hoses.
- Crows-foot type connections on air hoses shall be safety-wired at each connection.
- Compressed air lines that are in use shall have a whip check at each connection.

37. Silica

Exposure to airborne Silica occurs when cutting, sawing, drilling, and crushing of concrete, brick, ceramic tile, rock, and stone products.

- Any subcontractor with a potential to disturb silica must submit a written silica exposure control plan prior to beginning any
 work that would disturb silica containing materials. This would include documentation of training of employees on the sitespecific silica plan. All plans must follow 1926.1153.
- Reference Table 1 of OSHA's Silica standard.
- Exposure Control Plan must be submitted and reviewed by Wehr prior to beginning any work that would disturb silica containing materials. This would include documentation of training on employee/site-specific silica plan.
- If contractor is not following Table 1, proper testing and/or historical data must be submitted.
- If respirators are required by either the employer or any OSHA standard, proper documentation (health evaluation, fit test, etc.) must be provided.
- When cutting concrete/brick/block all employees must use water to help prevent silica dust exposure.

38. Welding and Compressed Gasses

- Welding equipment shall be kept free of oil, grease, or other oil-based products.
- Compressed gas cylinders shall not be exposed to sparks, slag, flame, or other heat sources.
- Flashback arresters located adjacent to the regulators are required on both the fuel and oxygen systems.
- Cylinders shall be secured in an upright position during use, storage, and transportation.
- Protective caps shall be in place over valve stems when regulators are not in place, when cylinders are in storage, and when cylinders are being transported or hoisted by motorized vehicles or equipment.
- Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials, a minimum distance of 20 feet or by a noncombustible barrier at least 5 feet high having a fire-resistance rating of at least one-half hour.
- Cylinders shall not be taken into confined spaces.
- All cylinders must be identified with the contractor's name.
- Welding screens shall be used when weld stations or fabrication areas are established.
- Compressed air lines that are in use shall have a whip check at each connection.

39. Excavation Protection Selection Form And Daily Inspection Form

All Contractors performing Excavating/Trenching activities on site shall provide a "Competent Person" as defined by OSHA standards. The "Competent Person" shall be responsible for ensuring that employees are protected whenever working inside an excavation or trench. Contractors shall be required to select appropriate protection from cave-ins, in accordance with the OSHA Standards.

Contractors shall also ensure that excavations and trenches are inspected daily by the designated competent person, and whenever conditions are present which may have altered, or changed the configuration of the trench/excavation, such as heavy



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rains, snow, etc. Inspections records shall be turned into to Wehr daily. All excavations deeper than 5' must be sloped, benched or shored. All excavations shall be inspected by the designated competent person prior to employees entering the excavation and an assessment made as to whether protective systems are necessary.

Excavations

- Any excavation deeper than 6' that is not sloped or benched must be guarded to prevent falls. This guarding may be a warning line system 6' back from the edge of the excavation or a hard-guard system at the edge of the excavation. Any excavation deeper than 6' on site shall be evaluated by Wehr as well as the contractor's competent person to ensure employee and equipment safety.
- Any excavation/trench 19" or greater in depth shall have an appropriate means of access/egress.
- If using a trench box, the top of the trench box should extend 18" above grade when feasible.
- All excavations, regardless of depth, that do not have a hard guard, must be identified with an elevated, visual barrier. This may include but is not limited to: cones, barrels, snow fence, and danger/caution tape. This barrier must be so designed as to prevent non-authorized personnel from entering the area.
- Spoil dirt and equipment shall be kept at least 2 feet from the edge of the excavations.
- A stairway, ladder, ramp, or other safe means of egress shall be in trench excavations that are 4 feet or more in depth to require no more than 25 feet of lateral travel for employees.

Underground Utilities

- All underground utilities in the area must be located prior to excavating. This may consist of multiple steps including: Calling local "Before you dig" service, having a Ground Penetrating Radar Service conduct a survey, getting as-built drawings from any previous work, and working with contractors/owners who have completed prior work in area.
- Complete the Wehr Ground Disturbance Form. All parties on the form or a representative must complete their applicable portions prior to any excavating or ground disturbance.
- Pot Holing Once utilities are located and are known or suspected to be in the immediate excavation area, they must be
 visually located by a non-destructive means of excavating either hand digging or hydro/air vacuum excavating. This must be
 done prior to excavating with in 24" of the known utility.

Underground Utility Protection

All underground utilities and piping installed by a Wehr sub-contractor shall be marked with locating material such as mag tape or tracer wire. The locating material shall be placed at a minimum of 24" above the underground utility unless otherwise specified by an engineer, local jurisdiction, or by Wehr personal shall review and approve any request for a variance or deviation from this requirement.

- Third party locating services may be required to find the location of utilities including depth.
- Red Line drawings shall be updated daily to ensure proper location of installed underground utilities/piping.
- Red Line drawings/Ground Disturbance drawings shall be reviewed daily at the Ground Disturbance Meeting.

Ground Disturbance Form Sign-Off Procedure

- Contractor will complete Ground Disturbance Form for work to be performed, paying special attention to provide as much detail as possible to the location of the work.
- Contractor will be present at the Ground Disturbance Meeting held every morning.
- Contractors will mark up drawing and review the previous day's work on overall site drawing.
- Each contractor will have a specific color assigned to them for site drawing.
- Discussions will be made about present days' work.
- If lines are crossed on drawing, dig area will be walked by contractors involved.





- Make sure Red Lines are being updated to ensure accurate drawings. These markups shall include exact measurements and locations of lines, including depth.
- Any digging within 2' of any type of existing line must be hand-dug.
- Failure to attend the Ground Disturbance Meeting will mean NO digging will take place for that day.
- All MEP contractors will be required to attend this meeting daily. <u>Although these steps shall be followed, 3rd party line locate, contractor locate, radar, and potholing shall still be performed.</u>

See Ground Disturbance Form Attachment #4

40. Control of Hazardous Energy/ Lockout Tagout Policy

It is Wehr policy that no "live" work is done on Wehr sites. If a contractor deems this policy infeasible, Wehr must be contacted prior to work that deviates from this policy. Wehr shall conduct a Pre-Construction Meeting with all Contractors likely to perform Lockout/Tagout on site.

The Pre-Construction meeting shall be held in the Wehr Job-Site Trailer and attended by the following:

- 1. Wehr Team
- 2. Customer Maintenance Rep. (if applicable)
- 3. Customer Safety Rep. (if applicable)
- 4. Sub-Contractor Project Manager
- 5. Sub-Contractor Site Superintendent
- 6. Sub-Contractor Safety Rep.

Wehr shall ensure that all items established in the Electrical/Mechanical Pre-Construction Meeting are covered in detail.

All circuits, systems, machinery, or equipment that can be locked out, shall be locked out prior to the start of work. Any employee required to work on these systems shall ensure a "Zero energy State" is reached before work is performed.

Contractors performing work requiring LOTO shall develop specific procedures for control of hazardous energy sources (in addition to these general procedures) for any circuits, systems, machines, or equipment before any installation, maintenance, or servicing work is performed.

Zip ties/Tags shall not be used in lieu of locks.

All Lock-out/Tag-out procedures shall conform to all applicable OSHA standards and manufacturer's guidelines.

41. Electrical Tools And Extension Cords

- Extension cords used with portable electrical tools and appliances shall be of the three-wire type. Cords with the ground prong removed or rendered ineffective shall be removed from the job.
- Cords shall be rated for Hard or Extra-Hard usage.
- Electrical cords shall be covered and/or elevated to keep cords from creating a tripping hazard to employees or other persons in the area or cause damage to the cords.
- Ground Fault Circuit Interrupters (GFCI) shall be tested before use.
- Employees shall not operate electrical tools while standing in water.
- Electrical tools shall not be hoisted or carried by their power cords.
- Extension cords shall be free of repair or splice, kept clear of traffic aisles, and not subjected to vehicular traffic.
- Only cords 12 gauge or better may be used on site.
- A monthly color code inspection is required for all electrical cords and corded tools. For extension cords, both ends of the cord shall be marked. The color codes for each month are as follows:



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January – Red	July- Red
February- White	August- White
March- Blue	September- Blue
April- Red	October- Red
May- White	November- White
June- Blue	December- Blue

- Although this policy covers only electrical cords and corded tools, all other equipment on site that requires inspection per the 1926 OSHA standards must be conducted as the standard or manufacturer requires. This includes but is not limited to:
 - Rigging
 - Ladders
 - Fall protection
 - Fire extinguishers

42. GFCI Program

- Ground Fault Circuit Interrupters (GFCIs) will be used 100% of the time.
- The GFCI may be located at the service, the outlet, or a GFCI whip may be used.
- No circuit breaker will take the place of a GFCI on any power source.

43. Electrical

- All temporary and permanent electrical work installation and wire capacities shall conform to the National Electrical Code and other applicable federal, state, and local codes.
- Only qualified electricians familiar with code requirements shall be allowed to perform electrical work.
- No employee shall be permitted to work on any energized electrical power circuit without first informing Wehr Staff.
- All temporary electric wiring shall be installed so the wiring cannot be damaged.
- Temporary Panels shall be provided, and each service feeder or branch circuit at the point shall be legibly marked to indicate its purpose. On circuits exceeding 600 volts, "Danger High Voltage" signs shall be posted where unauthorized persons might come in contact with live parts.
- Entrances to rooms and other locations containing exposed live parts shall be marked with conspicuous warning signs forbidding unqualified person to enter.
- Safe working distances should conform with 1926.403(i)(1)(i).

44. Cranes

- All Crane Operators shall be certified (NCCCO, NCCER, or OECP. CIC Certification accepted if certification was obtained prior to 12-2-19).
- Prior to a Critical lift being performed, the subcontractor shall submit a copy of the Lead-Rigger's resume.
- All Signalmen shall be "qualified" as defined by 1926 Subpart CC.
- The Subcontractor will be required to submit a copy of their rigger/signal person qualification program.
- A third-party crane inspection will be conducted after every assembly.
- Documentation of annual inspections as well as monthly inspections shall be provided to Wehr staff prior to work beginning.
- Operators shall not hoist improperly rigged or over capacity loads.
- For cranes that do not require "assembly," a qualified person must conduct a post set-up inspection. This inspection will be documented. A copy of this documentation shall be turned into Wehr The crane operator may not be the qualified person for post set up inspection.
- Accessible areas of crane's rotating superstructure and counterweight shall be barricaded.
- Ground assessment form will be completed for cranes before work begins.





• Certified crane operators shall provide a copy of written evaluation that complies with 1926 Sub-Part CC App C. *See Attachment #5 Ground Assessment Form*

Inspections

The following inspections are required of all cranes and hoisting equipment:

- Shift inspections
- Monthly inspections
- Annual inspections
- Shift, monthly, and annual wire rope inspections
- Top wind speed under which the crane can be safely operated based on the crane's current configuration shall be noted on the daily crane inspection form. Manufacturer guidelines shall be followed.

In addition, the following special inspections are required circumstances:

- Post-assembly, 3rd party inspections
- Pre and post-erection inspections of tower cranes
- Equipment used in severe service
- Inspections of certain modified equipment
- Inspections of certain repaired/adjusted equipment
- Cranes shall be inspected in accordance with OSHA 29 CFR 1926.1412 Requirements.
- For those cranes that are required to be "assembled" the contractor shall identify an Assembly/disassembly director (A/D director). This identification shall be made in writing to the Wehr team prior to the start of work.
- The A/D director shall meet the criteria for both a competent and qualified person.
- The A/D director shall ensure the assembly/disassembly crew is familiar with their tasks, the hazards associated with the work, and hazardous positions/locations that the crew needs to avoid.

Rigging

- Rigging may only be performed by a "qualified or certified" rigger.
- Rigging equipment shall be inspected prior to each use.
- Defective equipment shall be tagged defective and removed from the site.
- Capacities of rigging equipment shall not be exceeded.
- Loads must not be hoisted unless the weight is known, and the rigging equipment is adequate and properly attached.
- Engineered softeners shall be used on all edges when synthetic rigging is used.

Critical Lifts

A Critical Lift plan and JSA shall be submitted to Wehr for all lifts that include any of the following prior to work beginning:

- When operator may lose line of sight with the load (Blind hoisting)
- Includes more than one piece of equipment
- Exceed 75% of the cranes lifting capacity
- Involve the lifting of Specialized Equipment
- As deemed necessary by the Wehr Team
- Hoisting Personnel
- Helicopter picks
- Traveling with a load

45. Tilt-Up/Precast/Steel/Masonry Bracing Requirements





Tilt-Up/Precast

• Only employees critical to the wall operation are allowed in the exclusion zone.

The Exclusion Zone must:

- Be constructed of at least snow fence (safety fence).
- The exclusion zone shall be established at a distance of wall height plus 6' away from the wall(s) on the brace as well as non-brace side.
- When set panels are at least 100' from a panel being erected, then the exclusion zone on the brace side may be moved within 6' of the foot of the braces.
- When the exclusion zone can be moved to within 6' of the braces, "Danger" tape may be used in lieu of snow fence. The non-brace side must still be maintained at wall height plus 6' with snow fence.
- If non-essential employees must gain access to the exclusion zone, an Exclusion Zone Permit must be issued by Wehr staff.
- No bracing may be removed until permission is given to Wehr from a Registered Professional Engineer.
- The bracing requirements in apply to tilt-up panels, precast panels, as well as masonry walls and temporary steel bracing.
- Copy of bracing plan needs to be submitted to corporate field operations prior to work beginning.
- Any modifications must be approved by a registered professional engineer and changes must be updated in the submittals provided to Wehr
- Any deviations or changes to a temporary bracing plan after the approval process must be resubmitted to Wehr for review
- If "leaner" panels are required, the contractor shall include this in their bracing plan. This should also include, location, all details of necessary components such as braces, tilt wall anchors, inserts, and bolts used for bracing. This must be approved and stamped by a Registered Professional Engineer.
- Bracing plan must include sequencing of erection.

Steel

- Bracing shall have a "brace bay", meaning at the starting point of erection, bracing must be on all 4 sides. Bracing plan shall then be designed from brace bay.
- Bracing plan must include sequencing of erection, material being used as temporary bracing, attachment method, and must be signed by a principle of the company.
- No bracing may be removed until permission is given to Wehr from a Registered Professional Engineer.
- Copy of bracing plan needs to be submitted to corporate field operations prior to work beginning.
- Any deviations or changes to a temporary bracing plan after the approval process must be resubmitted to Wehr for review.

Masonry

- Refer to bracing requirement set by Council for Masonry Wall Bracing.
- Copy of bracing plan needs to be submitted to corporate field operations prior to work beginning.
- Bracing plan must include sequencing of erection, material being used as temporary bracing, attachment method, and must be signed by a principle of the company.

46. Material Storage

- Material shall be stored in an orderly and stable fashion and kept clear of work areas and traffic aisles.
- Pipe and similar materials shall be stored appropriately as to prevent it from spreading.
- Flammable and combustible materials shall be stored at least 25 feet from hot work or other sources of ignition. Fire extinguishers shall be provided at least 25 feet from, but not more than, 75 feet from said storage.
- Flammable liquids shall be stored in containers marked as such and labeled as to their contents.
- Signs indicating "No Smoking within 50 Feet" of flammable material storage shall be posted.
- Flammable liquids other than in bulk storage shall be kept in approved safety cans.



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- At no time shall propane be stored inside a structure.
- Unlike gasses may not be stored together.

47. Material Handling

- Loads shall be adequately secured to prevent displacement when being transported by vehicle or equipment.
- Tag lines shall be used to control all loads being hoisted overhead.
- Loads shall not be hoisted or swung over employees' heads.
- Operators shall ensure that all loads are secured and moved in such a way as to prevent tipping.
- Only loads with known weights shall be moved.
- All Power Industrial Truck and Forklift use shall follow all requirements set forth by the OSHA 1910.178 standards.
- All operators shall meet the training/re-training requirements set forth by the OSHA 1910.178(I)(2) standards.
- All lifting devices must be engineered and labeled with capacities and weight of attachment, if applicable.
- Custom made lifting devices must be provided with the engineering drawings of the device(s), which shall include the stamp from the registered professional engineer that designed the custom lifting device.
- Lifting devices must be secured to the equipment to avoid displacement.

48. Hand Protection

Wehr requires appropriate gloves to be used while performing construction activity. Gloves shall be ANSI, cut-resistant level #3 or #4. Contractors are required to establish a glove policy that will provide education to their employees in the proper selection, hand placement and use of hand protection, and supply the appropriate gloves as required for the hazards associated for the work. Other types or additional gloves may be required based on the hazard. Other types may include but are not limited to:

- Electrical
- Chemical resistant
- Leather (welding)

Although other tasks may require a glove other than an ANSI Cut #3, there are ANSI Cut #3 options for most rubber and leather requirements.

49. Hearing Protection

- Approved hearing protection shall be worn when employees are exposed to loud noise. As a rule, if you need to raise your voice to be heard, hearing protection is necessary.
- Any exposure to 85 dBA or greater, hearing protection shall be required.
- Headphones or earbuds should not be used as hearing protection.

50. Working in Extreme Temperatures

In instances where the Heat Index reaches levels more than 95 F, the Project Team shall:

- Develop with subcontractors a break schedule to ensure that employees working in extreme heat/temperatures are given at least a 10-minute break, every 90 minutes.
- Coordinate and modify work schedules with contractors to minimize exposing workers to working in extreme heat.

In cases when employees will need to work in extreme cold temperatures

- Make sure employees are wearing appropriate clothing
- Be mindful to protect the ears, face, and hands
- Workers should take frequent, short breaks in warm, dry shelters





- Make sure warm beverages and food are available
- Always use the buddy system- work in pairs so one worker can recognize the danger signs
- Be aware of the signs and symptoms of hypothermia
 - o Shivering
 - Loss of coordination
 - Confusion
 - o Blue skin
 - o Slowed pulse and breathing
- If you recognize any of these symptoms, immediately take the employee to a warm, dry place, and begin to warm the person's body

51. Stop The Drop

- When feasible, the aerial lift shall be parked directly under the work to prevent objects from falling to floor below.
- When an aerial lift is being used to install material such as piping, duct work, etc., a rack or support that has been approved for use by the manufacturer shall be used to secure the material in the lift.
- If there are no attachments (rack/support) available for the equipment being used for installing/transporting material, the contractor shall devise a safe work plan for installing/transporting their material. The safe work plan shall be presented and reviewed.
- Spotters, barricades, or tool tethers shall be used for all elevated work that could pose a threat to employees working below.
- All overhead work shall be barricaded, or a spotter(s) must be present to keep people out of the area.

52. Lightning Policy

- Lightning should be monitored using some type of mobile app or website (*WeatherBug as an example).
- When lightning is with 10 miles of the project, outside, elevated work shall be shut down. This will include, but not be limited to steel erection, roof work, and crane activities.
- When lightning is within 6 miles of the project, all outside, ground activities shall be shut down.
- When the lightning is outside the 6 to 10-mile range, these tasks may resume.

53. Contractor Responsibility for Site Safety

We all have a responsibility to ensure project security for our employees, the project site, and our customer's facility. It is important to report all theft or unauthorized personnel or suspicious activity to the Wehr Superintendent. All contractors shall give notice to Wehr Superintendent prior to removing or laying-off any employees. This notice shall include a list of all names affected by the removal or lay off. This is required to ensure no unauthorized personnel come back on to the site and to be aware of any potential disgruntled employees that may threaten the security of the project. In the case where projects distribute badges or access cards, that property must be returned to Wehr. If security guards have been employed on site, the names of the dismissed employees will be provided to security so access to site can be denied.

54. Carbon Monoxide

Carbon Monoxide is a colorless, odorless, and tasteless hazardous gas that accumulates in enclosed spaces as a result of internal combustion engines. This occurs with the use of Gas, Diesel, and Propane powered equipment. When any type of this equipment is used in an enclosed space or building, a hazardous atmosphere can occur. CO is slightly lighter than Air so it will tend to accumulate at higher levels of the room. Workers at elevated heights are at higher risk to CO poisoning. Several steps can be taken to prevent this from occurring:



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- Once building or area is enclosed and does not have natural ventilation, all gas-powered engines need to be removed and used outside (generators, mixers, gas powered saws, etc.).
- Diesel and Propane powered equipment used inside must be low emission (equipped with exhaust scrubber which works properly).
- Use Electrical equipment when available.
- Mount CO monitors in suspect areas. OSHA PEL is 50PPM of CO (TWA over 8Hrs) with an action level of 25PPM. If readings
 are above 25PPM, action must be taken to ventilate the area. These types of monitors are available at local hardware stores
 (State OSHA plans may be more stringent).
- Try to maintain natural ventilation where available. Leave doors/windows opened when feasible.
- If natural ventilation is not an option and the hazard is still present, then mechanical ventilation will be necessary.
- If there are complaints of CO, take them seriously.

55. Health Crisis

If there is a health crisis that could affect the physical well-being of employees, the subcontractor will be required to create a plan, and submit to Wehr for review. A health crisis may include, but is not limited to SARS, COVID, H1N1 or any other illness that may have a significant impact on the project. At a minimum, the plan should include:

- How identification of sick or ill workers will take place
- The protocols for the removal and remobilization for sick employees
- Any safe work plans to minimize the spread of the illness
- How cleaning and disinfecting of shared tools and equipment will take place and how often
- Any additional PPE required
- A plan for demobilization should it be required
- How the contract tracing will be done

In addition to these elements, the contractor shall follow all Federal, State, and local applicable laws and guidelines. The contractor shall also comply with Wehr policy as well as all owner requirements.

56. Foreign Object Debris (FOD)

Foreign Objects can cause major damage resulting in employee injury, property damage and unplanned shutdowns when introduced into some manufacturing processes. When an area or project has been identified as a FOD Prevention Area the following procedures should be observed. This process is especially critical when working in an existing facility or during commissioning.

- All employees should be trained on FOD awareness if working in a FOD Prevention Area
- "Clean as you go" this process of ongoing cleaning and removing debris and unnecessary materials is a critical step in keeping many of the foreign objects away from the manufacturing process.
- Organize: parts and pieces involved in a work activity should be organized in container that prevent them from spilling. Tools should also be organized in this manner and may also require tethering, either to the workstation or person.
- If working at heights in an aerial lift mesh netting and a floor covering may be required depending on activity.
- Food and Drink not allowed in areas designated as a FOD prevention area.





• If entering a FOD Prevention Area from outside conditions, Boot scrubbers and cleaning stations should be placed at that entry point.

My Commitment to Safety

I have thoroughly read all the information in this Subcontractor Safety Orientation Manual provided by Werh Constructors. I am committed to following through with all training procedures for my employees. I will become familiar with OSHA regulations and Wehr's safety policies outlined in this manual. I realize ignorance of these regulations and policies is no excuse for noncompliance.

I join Wehr in the goal of zero incidents for all projects. I pledge my company's commitment to providing a safe and clean workplace for all employees on this job.

Project Name	Project Number
Company Name	<u>Wehr Constructors</u>
Subcontractor's Signature	Site Manager/Safety Representative's Signature
Date	– Date
Date This is to be signed by the Foreman, Supervisor or any employee in a leadership role during the	Date , Site Manager, Project Manager, Safety Representatives site safety orientation.



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Attachment #1 JOB SAFETY ANALYSIS

Division:			
Project:			
Location:			
Authored by:			

JOB/Task

#	Task	Potential Hazards	Control
1			

Required PPE	

Additional Questions:



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- 1) Does the job task require special training??
 - a) Yes NO NO i) If Yes what type
- 2) Have the protentional Hazards and Controls mentioned above been explained to the employee completing the task?
 a) Yes No

Attachment #2

HOT WORK PERMIT

BEFORE INITIATING HOT WORK, ENSURE PRECAUTIONS ARE IN PLACE! MAKE SURE AN APPROPRIATE FIRE EXTINGUISHER IS READILY

This Hot Work Permit is required for any operation involving open flames or producing heat and or sparks. This includes, but is not limited to: Brazing, Cutting, Grinding, Soldering, Thaving Pipe,



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Torch Applied Roofing, and Cadwelding.

INSTRUCTIONS	Required Precautions Checklist
Verify precautions listed at right (or do notProceed with the work).	 q Available sprinklers, hose streams and Extinguishers are in service /operational.
HOT WORK BEING DONE BY:	q Hot work equipment in good repair.
q EMPLOYEE	 Requirements within 35 ft of work q Flammable liquids, dust, lint and oil deposits removed.
q CONTRACTORJob No DATEJob No LOCATION/BUILDING & FLOOR	 q Explosive atmosphere in area eliminated q Floors swept clean. q Combustible floors wet down, covered with dampsand or fire-resistant sheets. q Remove other combustibles where possible. Other-wise protect with fire-resistant tarpaulins or metal shields. q All wall and floor openings covered. q Eire resistant tarpating superaded beneath work.
NATURE OF JOB	 Work on walls or ceilings/enclosed area Q Construction is noncombustible and without combustible covering or insulation.
NAME OF PERSON DOING HOT WORK	 q Combustibles on other side of walls moved away. q No Danger exists by conduction of heat into anotherarea. q Enclosed equipment cleaned of all combustibles. q Containers purged of flammable liquids/vapors
I verify the above locations have been examined, theprecautions checked on the Required Precautions Checklist have been taken to prevent fire, and permission is authorized for work. Signed:AM DATE:AM DATE:PM PM PM GOOD FOR ONE DAY ONLY.	 Fire watch/Hot Work area monitoring q Fire watch will be provided during and for (30 minutes) after work, including any coffee or lunchbreaks. q Fire watch is supplied with suitable extinguishers. q Fire watch is trained in use of this equipment andin sounding alarm. q Fire watch may be required for adjoining areas, above and below. q Monitor Hot Work area for 30 minutes after job iscompleted.
q OTHER SPECIAL PRECAUTIONS MAY BEREQUIRED BEFORE HOT WORK BEGINS.	



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Attachment #3

DAILY AERIAL LIFT INSPECTION FORM

LIFT #:			In	spector	:			
Job #:	Week Beginning:							
Instruction:								
Each aerial lift will be oper	ationally	tested	and visu	ally insp	ected	each	day. Th	ne designated inspector will
place a (v) in the appropria	te box w	hen an	item pas	ses insp	ectio	n. Lea	ve the	box empty and note a brief
description of any problem.	. Immedi	ately n	otify the	Forema	in of d	any ae	rial lift	deficiencies. The Foremen will
forward this inspection form	n to the So	afety D	ept. at th	e end oj	f each	week	_	
Operating Controls	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Maintenance Needed
(Operational)								
Emergency Stop & Brakes								
Base Operation Controls								
Basket Operation Controls								
Foot Controls (if								
applicable)								
Fire Extinguisher								
present/inspected								
Safety Signs (Readable)								
Boom								
Hydraulic Leaks								
Extension Chain & Pivot								
Pins								
Electrical Lines								
Basket Cage and Gate								
Anchorage Points								
Base (Visual)								
Broken, Cracked or Loose								
Parts								
Leaks								
Electrical								
Tires & Outriggers								
Back Up Alarm & Manual								
Engine Compartment								
(Visual)								
Oil Level								



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Fuel Level								
Belt, Hose & Motor								
Condition								
Battery & Electrical								
Addition Notes:								
Foreman Signature:						Dat	e:	



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Attachment #4 Wehr Constructors **Ground Disturbance Form**

The intent of this form is to ensure all pre-planning is completed prior to any excavation. Although this form stems from safety concerns, it will also help ensure work is completed correctly; thus, preventing re-work, added costs, and schedule impacts. Hand diaging shall be implemented within 2' of any underground utilities. All hand tools shall consist of non-conductive material (ex. Fiberglass handles).

This form should be completed anytime there is a ground disturbance, which may include:

- New excavation
- New location for excavation
- Pile/Post driving / Boring
- Core drilling

Subcontractor:

Date:	
Location:	

Type/Reason:

Required Steps:

- 1. Does this work require you to call the "call before you dig" hotline?
- YES:_____ NO:____

- 2. Verify Schedule & approach has been approved by _____'s Field Staff
- Subcontractor:_____
- Layout has been performed & compared to utility locate 3.

Subcontractor:

- Required depth has been verified, based off of FFE Δ.
- Subcontractor:

5. Will backfill compaction require testing? YES:_____ NO:_____

6. Will excavation depth exceed 5'? YES:_____ NO:_____

7. Safety plan has been verified with countermeasures to concerns

Subcontractor:

8. Red-Line Drawing has been reviewed to identify underground utilities and verify As-Builts with other contractors

Subcontractor:

Electrical Contractor:

Mechanical Contractor:

:

Site Contractor:

- Fire Protection:
- 9. Are underground utilities/as-builts present in location to be disturbed?

YES:_____ NO:____

10. If answer to #9 is YES, contractor must hand-dig within 2 feet of identified utility

Subcontractor:

11. List utilities located in proposed ground disturbance area:

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Attachment #5

Ground Conditions Assessment Form

Site_____ Date

1926.1402 requires that Wehr sites will not allow a crane to be set-up on its sites 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.

At a minimum, the following items must be reviewed by the means including, but not limited to; site drawings, as-built drawings, locations services and soil analysis:

- Verify the Location of crane set-up or Cranes path of travel
- Overhead power lines
- Unstable/soft ground
- Restricted swing radius
- Soil compaction
- Underground utilities
- Other cranes/equipment
- Possible voids/tanks
- Adequate distance from Excavation (Surcharge)



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Wehr Constructors Superintendent

Crane Operator_____

Lifting Crew Foreman_____



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Attachment #6

Wehr's Drug-Free Workplace Summary

Prohibited Conduct:

The following behaviors are prohibited on a Wehr job site:

- Use, possession, manufacture, distribution, attempted distribution, dispensation, attempted dispensation, sale, attempted sale, purchase, attempted purchase, cultivation, or storage, or being "under the influence" of illicit drugs (defined as a positive test result);
- Unauthorized use, possession, or being "under the influence" of alcohol (defined as a breath alcohol concentration of .02 or higher, unless otherwise specified in the Permitted Conduct section of this policy summary);
- Conviction for any criminal drug or alcohol statute for a violation occurring in the workplace, while conducting company business, while driving company owned, rented, or leased vehicles or personal vehicles being used for company business;
- Failing to notify a Vice President/Manager or Human Resources of any criminal drug or alcohol statute conviction or arrest within 24 hours or the next working day for a violation occurring in the workplace, while conducting company business or while driving for company business;
- Failing to report any change in driver's license status, within 24 hours or the next working day, to his/her supervisor, if his/her job function may include driving a vehicle for company business;
- Taking a prescription drug that is not according to their physician's direction;
- Refusing to consent to, remain ready for, cooperate with, submit to, or tampering with a drug and/or alcohol specimen or testing;
- Having any drug or alcohol statute conviction or arrest or engaging in the following conduct, either off company premises or during off-duty hours:
 - Possession, use, manufacture, distribution, dispensation, cultivation or sale of controlled substances, illegally used drugs, or alcohol off company premises that may adversely affect the company, the team member's work performance, or the team member's safety, others' safety at work or the general public;
 - Illegal use of legal substances off company premises or during off-duty hours that may adversely affect the company, the team member's work performance, the team member's safety or others' safety at work.



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Kinds of Testing

The only way to know with certainty if an individual is under the influence of drugs and/or alcohol is to conduct a test. The primary method used to determine the presence of drugs in the system under this policy includes a urine test; the presence of alcohol is determined by a breath alcohol test. For the safety of all our team members, tests for drugs and/or alcohol in the following circumstances: pre-employment, during the probationary period, reasonable suspicion, post-accident, random, return from layoff, as required by the customer or government, and as a follow-up to treatment or assessment.

Wehr requires a 10 Panel Expanded Drug Screen administered in compliance with SAMHSA (Substance Abuse & Mental Health Service Administration or NIDA (National Institute on Drug Abuse) requirements. The 11-panel drug screen includes Amphetamines; Barbiturates; Benzodiazepines; Buprenorphine / Metabolite; Cannabinoids; Cocaine / Metabolites; MDMA; Methadone / Metabolite; Opiates; Oxycodone / Oxymorphone; Phencyclidine.

Consequences

Any violation of Wehr's DFWPP, even a first offense, may be a basis for disciplinary action, up to and including termination. However, particularly serious violations, such as selling drugs on company property while conducting working on our jobsites will normally result in immediate termination and referral for criminal prosecution.

Inspections

Should Wehr have reason to believe that an individual may be in possession of alcohol, drugs, or drug paraphernalia on company property or on company time, Wehr may search company property or personal effects or vehicle while on company property or on company time.

Safety-Sensitive Positions

Any position, which by the nature of the work involved is accompanied by such risk, that even a momentary lapse of attention could have serious consequences to the safety of the co-worker, other co-workers, customers, the company, or the general public. For purposes of this policy, the following are the considered safety-sensitive positions:

- All personnel driving a company or personal vehicle for work regardless of whether it is a rented or leased vehicle
- All personnel on jobsites
- All personnel assigned to the service team or maintenance personnel
- All self-perform team members

Confidentiality

All information concerning drug or alcohol testing referrals and testing results, or treatment and rehabilitation of a team member will be kept confidential.

Reservation of Rights

Wehr reserves the right to interpret, change, or rescind the policy in whole or in part, with or without notice. In addition, changes to applicable federal or state laws or regulations may require Wehr to modify or supplement the policy. For more information on this policy, you may request a copy of Wehr's DFWPP.

Random Testing

Wehr may require Subcontractor (at Subcontractor's sole cost) to implement pre-access, random, reasonable suspicion or post incident drug testing that (1) randomly tests at least 5% of the Subcontractor's employees or one of the Subcontractor's tiered



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contractor's employees at least once a month; and (2) submit a letter from the Subcontractor's HR department confirming compliance with Wehr's DFWPP.



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Attachment #7

The ADA protects the rights of the disabled and mandates that disabled individuals have equal access to employment opportunities. Consistent with the ADA, Wehr is an equal opportunity employer that requires all contractors and employees to adhere to a discrimination and harassment free workplace, to protect the privacy of disabled workers, and to provide reasonable accommodations to qualified individuals with disabilities to ensure that they can perform the essential functions of the job without creating an undue safety risk of accident or injury on construction projects and job sites. By following the recommendations of the ADA, as well as recommended safety protections established by national safety organizations, Wehr and its contractors can protect the rights of all workers, including disabled workers while mitigating the risk of an accident or injury at a construction site.

To do so, as an employer you must not make any assumptions about an employee's abilities or medical conditions. Instead, you should:

- Consider the project as a whole and outline the essential functions, including physical requirements, of the anticipated jobs to be performed on the project site without regard to any specific employee or individual's condition or characteristics. Essential functions are defined as the fundamental job duties of the employment position. A job function is essential if the job exists to perform that function. The ADA permits an employer to establish job related qualification standards, including the physical and mental standards necessary for job performance, health, and safety. Those standards, however, must not screen out, or tend to screen out, individuals based on disability unless they are job-related and consistent with business necessity. For example, you can require that employees meet national industry safety guidelines. But you can't have a rule that bans all people with hearing impairments from a job as such a rule is based solely on a disability and on the misconception that hearing deficiencies can't be sufficiently corrected by hearing aids.
- Identify the safety risks of accident and injury created by the project and/or the specific anticipated jobs to be performed on the project and put into place appropriate control measures to mitigate these risks using industry or scientific objective data.
- Designate specific safety and/or human resources personnel to observe workers on the project and to review fitness for duty exams and other medical information concerning employees working on the site and periodically assess whether all the safety risks to all employees, including those with medical conditions or other limitations that create a risk of injury or accident have been assessed properly and if not, implement appropriate control measures for the entire project or group of workers performing the same type of jobs using industry or other scientific objective data.
- If an individual's physical limitations, disability, or medical condition otherwise prevents him/her from performing the essential functions of the job and adhering to the identified control risk measures, conduct an individualized inquiry with the employee (in conjunction with HR and/or legal counsel) to determine if the employee can perform the essential functions of the job with a reasonable accommodation that does not create a direct threat of harm. You should NOT make any employment decisions without conducting this individualized assessment. Nor should you apply a blanket rule or prohibition based upon an individual's age, ability to hear, see, or walk that otherwise adversely impacts that individuals' employment as same runs afoul with the ADA.
- An individual with a disability is not qualified for a specific employment position if he or she poses a "direct threat" to his or her own health and safety or to others. Specifically, a direct threat is a situation presenting a significant risk of substantial

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harm to the health or safety of the employee or others that cannot be eliminated or reduced by a reasonable accommodation. An elevated risk of injury is not sufficient, and the risk must be current, not speculative or remote. The assessment must be based on objective, scientific evidence, not on subjective perceptions, irrational fears, or stereotypes. The determination must be made on a case by case basis and relevant evidence may include input from the employee, medical doctors, rehabilitation counselors, or physical therapists with expertise in the disability or direct knowledge of the individual with a disability. Be sure to consult with the employee themselves and colleagues, seeking opinions and ensuring they are involved in discussions which affect them. Those involved in the work often propose good solutions. Proper factors to consider when conducting the individualized direct threat analysis include:

- Does the employee's condition create a direct threat to their health and safety or the health and safety of others?
- What is the duration of the risk based on medical data?
- What is the nature and severity of the potential harm based on industry and national safety standards?
 - If the condition is well managed with medication or other safety protocols, the employer may conclude that review of the situation through periodic medical updates at regular intervals is sufficient.
- What is the likelihood that the potential harm will occur?
 - Can these risks be prevented or adequately controlled through normal health and safety management?
 - Can the risks be addressed by allowing other colleagues to do certain elements of the activity, or by
 providing suitable, alternative equipment, for example, automated equipment to reduce manual handling
 or change systems of work?
- Is the potential harm imminent?
 - If not, what reasonable adjustments could be put in place to prevent or adequately control the residual risks?

Staying alert and proactive in identifying and addressing workplace risks and concerns can help reduce safety accidents and injuries on a job site. However, we must make sure we adhere to the rights of all employees and workers when addressing these safety risks and concerns. Relying on industry standards, the most current medical knowledge, and the best available objective when conducting individualized assessments of an individual's ability to perform the essential functions of a particular job on a job site will ensure compliance with the law and help us mitigate these safety risks and concerns.



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