Safety Policy Statement

McGough's project safety standards are designed to define both McGough employee and trade partner safety expectations on project jobsites. **This document is not all encompassing of McGough's safety policies or project safety requirements. Reference the McGough Health and Safety Manual and Owner safety manual for additional information regarding policies and procedures for the project.**

Contractors and trade partners are solely responsible for the safety of their workers and/or visitors as mandated by the rules and regulations of the McGough Safety Manual, OSHA 29 CFR 1926 Safety Standards for the Construction Industry, and all local, state, and federally recognized standards and codes.

Project Managers, Superintendents, Contractor General Foremen, Safety Coordinators, and Foremen are also recognized as the key individuals to the successful implementation of safety standards for the project. It is the responsibility of each individual to manage safety on the jobsite by ensuring their workers are properly trained and equipped to perform their work task in a safe manner.

All workers also have a safety responsibility to protect themselves, their fellow workers, and visitors to the jobsite by maintaining safe work areas and performing all work tasks in a safe manner. Workers are also required and empowered to immediately stop and report all unsafe work practices and conditions that could result in injury or property damage to management.

Safety Meetings

Daily Safety Pre-Task Plan Meetings

Contractors and trade partners are required to conduct a "Daily Safety Pre-Task Planning" meeting with all workers at the beginning of each work shift to discuss safety and upcoming daily work activities (i.e., specific work task, equipment to be utilized, hazards associated with the work task, safety procedures, etc.).

Weekly "Toolbox Safety Talk" Meetings

Trade partners are required to conduct weekly "Toolbox Safety Talk" meetings at the jobsite for all of their workers to increase safety awareness on this project. The safety topic(s) for these meetings should relate to the work that is underway or immediately upcoming. Every worker that attends these weekly toolbox safety meetings will sign their signature documenting their attendance. A copy of the weekly toolbox safety meeting minutes with signatures must be submitted to McGough on a weekly basis.

Biweekly Safety Meetings

Contractors and Trade partners are required to participate in biweekly jobsite safety meetings with all workers onsite in order to discuss a specific safety topic, general safety items and upcoming work activities for the site (i.e., site logistics, access/egress changes, high-risk activities, congested areas, upcoming events, etc.).

McGough, at its sole discretion, reserves the right to require trade partners to submit any safety documentation or qualifications pertaining to the project if conditions dictate.

Housekeeping (Hazard 2.26)

All rubbish shall be disposed of as it is generated and be immediately placed in trade partner-provided rubbish containers. Rubbish containers shall be mobile and located near your work area. Trade partners are responsible for emptying their

rubbish containers at the end of every day. Debris is not allowed to be consolidated on the floor and cleanup must be performed continuously throughout the day. In the event housekeeping isn't being performed, trade partners must provide manpower in proportion to total manpower onsite for a composite cleanup crew at the trade partner's expense. Examples of this include but are not limited to the following:

- Protruding nails must be bent flat or removed as the work proceeds and before disposal.
- Banding iron must be flattened and/or placed in a proper trash container as the bands are broken.
- Off cuts of round stock such as all-thread rod and conduit must be contained as they are cut.
- Incorporate just-in-time deliveries to reduce the amount of stored materials in work areas.
- Use of material carts, dollies, and racks to store and move materials around the jobsite. These tools will alleviate the amount of material handling.
- Trade partners shall hang electrical cords off the ground utilizing non-conductive materials.
- No corridor, aisle, stairway, door or exit shall be obstructed or used in a manner as to encroach upon routes of ingress or egress.
- Provide adequate trash containers for each crew to clean up as work progresses.

Mobile Elevating Work Platforms (MEWPs) (Hazard 2.02)

- Mobile Elevating Work Platforms, otherwise known as aerial lifts or aerial work platforms (AWPs), must be operated according to the manufacturer's recommendations and only by trained and qualified employees. A personal fall protection system is required for ANSI Group B MEWPs (boom style). A 6-foot shock-absorbing lanyard is not considered an appropriate fall arrest system for MEWPs. The fall restraint or fall arrest system must be attached to the designated anchor point on the MEWP.
- Employees must keep both feet on the floor of the basket and not stand on the railing or toe board during operation. If it has been determined by a trade partner's competent person that there are no feasible means to access an area without leaving the floor of the basket, a safe work plan must be completed and signed off by the trade partner's competent person and all workers involved in the task. This safe work plan must detail the fall protection plan that includes the appropriate anchor point, fall protection equipment to be used, and safe working platform for the task.
- Each work activity and area will require a sperate safe work plan to be reviewed with a competent person and the involved workers.

All Season Weather Guidance (Hazard 2.04)

- The decision to work will be up to the jobsite superintendent and will take into consideration forecasted temperature, wind chill, and snowfall amounts. The jobsite superintendent will also take into consideration the type of work to be performed and if the personnel and equipment have adequate means and shelter to be safe and productive. The superintendent decision to allow work will not override a trade partner's ability to follow their own company policies.
- Manufacturer's recommend that Hydromobile cranes, rough-terrain forklifts, skid steers and other hydraulic-controlled equipment must be protected from the cold if used when the temperature is below -5°F. A method to keep this equipment warm prior to use must be considered. The manufacturer's guidance for each piece of equipment will be the deciding factor on usage and protection requirements.
- Tower crane manufacturers recommend an operating temperature above -13°F.
- Adequate-sized jobsite shelters must be heated to a minimum of 50°F for personnel.
- If the temperature is below -25°F, or if the wind chill factor is below -35°F, McGough employees and contractors will not work outside unless it is an emergency (repair an occupied facility, emergency snow removal to prevent collapse, etc.).

In the event of severe weather, please have workers and contractors call the McGough **Weather Advisory Line at 651.634.4686**. Only the date and **closed** jobsites will be on the message.

Concrete and Masonry (Hazard 2.10)

- When performing overhand bricklaying, employees shall be tied off when exposed to an elevated fall greater than six feet except when the wall being erected in front of them is a minimum of 32 inches in height (measured from the work platform). OSHA does not require fall protection when doing overhand bricklaying with a 32-inch wall in front of the employee. The wall is not considered fall protection but has been chosen with an ergonomic bias for the worker.
- Warning lines are not allowed by McGough in situations where a leading edge or advancing work surface is being constructed. These leading-edge situations require a complete guardrail system to guard the edge and for employees to use 100% fall arrest while working beyond the guardrail. For further information, see 2.18 Fall Protection.

Cranes (Hazard 2.12)

A suspended load is defined as any load connected to the crane and shall be attended to at all times.

Anyone conducting assembly/disassembly work, maintenance or repair on cranes or hoists at heights greater than six feet (1.8 m) shall use fall protection.

No part of crane, line or load may be able to reach within 20 feet of a power line during setup.

McGough defines a critical lift as one that contains one or more of the following:

- Any lift that requires more than one crane.
- Loads exceeding 75% of a crane's rated capacity.
- Picking over occupied spaces.
- Compromised ground conditions.
- Lifting of personnel (see form 3.33 Personnel Basket Pre-lift Checklist).
- Helicopter lift.
- Any lift closer than 20 feet from overhead powerlines.

If it is determined that a lift is to be considered critical, a detailed Crane Pick Plan must be prepared. A critical lift plan should include details such as size and weight of the load, equipment needed, boom length and angle, crane and boom positioning, required personnel and their certifications, crane capacity and annual inspection, load chart specific to the crane, sequencing and environmental conditions, ground conditions, utility locations, among others.

The critical lift plan should be thoroughly reviewed with the rigging crew prior to the lift to ensure that all necessary details and required safety procedures are in place.

McGough considers an engineered pick as a lift that is 90% of the crane's rated capacity.

Inspections – Annual Inspections

A thorough third-party annual inspection and function testing of the hoisting machinery shall be made by and documented by a qualified person, or by a government or private agency recognized by the U.S. Department of Labor, using the detail inspection criteria per regulation. Records shall be maintained of the dates and results of inspections for each hoisting machine and piece of equipment and kept on file for 12 months or until the next annual inspection.

As a reminder:

- The McGough Safety Department must receive all documents **ONE WEEK** prior to the pick (i.e., Pick Plans, Annual Crane inspection, NCCO Crane Operator certification, Rigger, and Signal Personal qualifications).
- All picks over 75%, picks using two cranes, or picking over occupied space are considered critical picks. Critical picks must be approved by the Safety Director.
- Any pick over 90% is considered an engineered pick. Engineered picks must be designed by an engineer and approved by the Safety Director.

Demolition (Hazard 2.13)

- The location of all electric, gas, water, sewer and communications must be identified and the lines shut down or locked out before work is started. If utilities cannot be shut off, service lines shall be conspicuously identified, temporarily relocated, and/or protected.
- Prior to the start of work, scanning and x-raying of slabs, floors, walls and ceilings shall be completed.

Excavation, Trenching and Shoring (Hazard 2.17)

- All utilities within the property boundaries of an occupied facility shall be located (physically seen) to identify the exact location and depth, by vacuum excavation methods, at a minimum of every five feet.

Ergonomics (Hazard 2.16)

- Stretching is required by McGough employees utilizing the McGough Stretch Right program.
- Trade partners are encouraged to stretch each day prior to work or as needed.

Fall Protection (Hazard 2.18)

Minimum Standards

- McGough does not allow the higher regulatory thresholds for fall protection systems found in Subpart R Steel Erection, Subpart L Scaffold, or Subpart Q Concrete and Masonry, including Pre-Cast Concrete.
- McGough does not allow for the use of a safety monitor system.

Guardrail Systems

- Employees must keep all body parts on the inward side of the guardrail system. Each employee who reaches or breaks the plane of a guardrail system with any part of the body must be protected from falling by using a personal fall arrest system except when performing work in an MEWP.

Leading Edge Fall Protection

- Leading edges present situations where overhead anchor points may not be achievable or where sharp edges are present. Traditional fall protection equipment used in these applications may be negatively impacted and not function appropriately in the event of a fall.
- Leading edge equipment must be utilized whenever working near a sharp edge that could impact the performance of fall protection equipment.
- Leading edge fall protection equipment must be utilized whenever an anchor point must be placed below a user's shoulder level.

Warning Line Systems

- A warning line system is only allowed to be used with a documented rooftop fall protection plan after all other levels of control have been exhausted.
- McGough only allows warning lines when working on a complete existing roof or on a completed new roof. Refer to 2.18F Fall Protection – Roof Perimeter for further guidance.
- When warning lines are used, they shall be erected not less than 15 feet from the unprotected fall hazard.
- Warning lines are not allowed by McGough in situations where a leading edge or advancing work surface is being constructed. These leading-edge situations require a complete guardrail system to guard the edge and for employees use 100% fall arrest while working beyond the guardrail.

Fall Protection – Roof Perimeters (Hazard 2.18F)

Hierarchy of Controls

There is a preferred hierarchy of controls to prevent falls from rooftops on McGough projects. A plan (which must be reviewed by a McGough Safety Manager) is required that addresses fall protection anytime work is to be performed on a roof. When the schedule of work activities dictates one system of controls to be infeasible, the rooftop safety plan must be updated; the next level of controls must be fully incorporated before the prior level can be removed. The hierarchy of controls is as follows:

- A complete rooftop perimeter guardrail system.
- 100% personal fall arrest system.
- A fall restraint system preventing access to the edge.
- A compliant flagging/warning line system at least 15 feet from the fall hazard and only when control levels above have been deemed infeasible.

Renovations and Existing Structures

Each existing roof shall have a site-specific Roof Safety Plan documented in place and be reviewed by the project superintendent, safety manager, foreman and trade partners prior to the commencement of any work activities on a roof.

Roof Warning Line Systems

A warning line system is only allowed to be used with a Roof Safety Plan (Form 3.44) after all other levels of control have been exhausted, and the following conditions are met:

- Warning lines are not allowed in situations where a leading edge or advancing work surface is being constructed. These situations require a complete guardrail system to guard the edge and employees use 100% fall arrest while working beyond the guardrail.
- When warning lines are used, they shall be erected not less than 15 feet from the unprotected fall hazard.
- Warning lines shall consist of ropes, wires, tapes or equivalent materials and be installed according to OSHA performance requirements.
- Each line shall be flagged or otherwise clearly marked at not more than 6-foot (1.8 m) intervals with high-visibility material.

Inspections

- In lieu of conventional fall protection, employees conducting inspections, investigations, or assessments of workplace conditions prior to the actual start of construction work or after all construction work has been completed must remain a minimum of 15 feet from the roof edge or any roof top openings that pose a fall hazards

(skylights/mechanical shafts, etc.). If 15-foot distance cannot be maintained, other conventional fall protection methods must be put in place.

- Inspections of this nature must be documented before entering onto a rooftop. Documentation shall include the names, dates, times, and scope of the inspection.

McGough-Controlled Inspections

McGough-controlled walkthroughs require a documented pre-walk safety meeting and the provision that no individual may approach a roof edge nearer than 15 feet. Individuals required to approach a roof edge nearer than 15 feet must employ conventional fall protection (guardrail, personal fall arrest) systems.

Fall Protection – Walking and Working Surfaces (Hazard 2.18G)

Walking and working surfaces for employees include roofs, leading edges, and elevated platforms.

New Construction

- Each employee on a walking/working surface with an unprotected side or edge that is six feet or more above a lower level shall be protected from falling by guardrail systems, safety net systems, or personal fall arrest systems.
- Once the roof is complete on new construction, please refer to fall protection in the Renovations of Existing Structures section for guidance.

Renovation of Existing Structures

- Every individual on a walking/working surface with an unprotected side or edge that is six feet or more above a lower level must be protected from falling by guardrail systems, safety net systems, personal fall arrest systems, or a compliant warning line system.
- Each existing roof shall have a site-specific fall protection plan, documented in place, prior to the commencement of any work activities.

Lock Out Tag Out (Hazard 2.27)

- In the event shift or personnel changes occur during maintenance and/or repair activities, the designated employee in charge of the group lockout/tagout (LOTO) shall take the necessary steps to maintain the continuity of the LOTO protection. This includes maintaining that all provisions in this procedure are adhered to and the transfer of LOTO devices between authorized employees is accomplished.
- During construction, the installing contractor shall be responsible for initiating the LOTO procedures for the machines and equipment they installed. Other affected contractors needing to lockout the equipment shall consult with the installing contractor prior to applying their own lock and tag to ensure all personnel are locked out correctly.

Personal Protective Equipment (Hazard 2.36)

Protective equipment, including PPE for eyes, face, head and extremities, protective clothing, respiratory devices and protective shields and barriers, shall be provided, used and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment. All PPE issued shall be at no cost to the employee. All employees will know and follow the procedures outlined in this program.

Gloves

Workers must use the appropriate gloves for their assigned tasks and the specific hazards encountered. The following types of gloves are approved for use:

Cut-resistant gloves: A minimum level of A3 cut resistance gloves are required for all workers. These gloves provide necessary protection when working with sharp objects or tools that pose a risk of lacerations or cuts, such as handling glass, metal fabrication, or using sharp-edged equipment like saws or blades.

For task that include hazards other than cut/laceration hazards, the following applies:

- **Chemical:** Impervious (chemical-resistant) gloves shall be worn when handling hazardous substances such as acids, solvents, or corrosive materials to protect against chemical burns and skin absorption.
  - Refer to the specific chemical's SDS for the correct glove type.
  - Persons assigned to working with chemicals (i.e., solvent vats) shall be issued their own individual gloves for hygiene purposes.
- **Leather/Heat Resistant:** Leather or rigging gloves shall be worn when performing rigging activities. Gloves made of heat-resistant material or leather shall be worn when performing arc welding or oxy/gas cutting, handling hot bearings, races or other materials or objects that have been heated beyond ambient temperatures.
- **Insulated gloves for cold weather:** In cold weather conditions, insulated gloves are essential to protect workers from frostbite and hypothermia. These gloves provide thermal insulation and maintain dexterity in cold temperatures, allowing workers to perform tasks safely.
- Gloves that offer cut resistance are preferred to provide additional protection against lacerations while still addressing the specific hazard the glove is intended for.

Owners or tour groups (not performing work) are not required to wear gloves.

An approved Job Hazard Analysis (JHA) must be conducted and endorsed by both the trade partner and McGough project safety representatives in cases where gloves are deemed unsuitable for the task at hand.

Helmets

A minimum of Class C Type II Helmet is required on all McGough projects. Must meet ANSI Z89 (Type II) performance standards 4.2.1.2 (front energy absorption), 4.2.1.3 (side energy absorption), 4.2.1.4 (rear energy absorption), 4.2.3 (retention system strength), and 4.2.4 (retention system effectiveness). In environments where falling objects are a constant concern, these helmets serve as a vital defense, reducing the potential for head injuries caused by debris, tools, or equipment. Moreover, construction slips, trips, and falls account for over 30% of all fatalities. Type II helmets significantly enhance safety by minimizing the impact of falls and reducing the severity of head injuries.

Workers engaged in electrical work, including but not limited to electricians, lineworkers, and maintenance technicians, must wear ANSI Z89 Class E Type II helmets to protect the potential risk of electrical hazards. Workers who may be exposed to chemical hazards are required to wear Class E Type II helmets.

Safety Glasses

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, or chemical gases or vapors. Eye and face PPE must comply with ANSI Standard Z87.1-2003 (Z87+), Occupational and Educational Personal Eye and Face Protective Devices.

Safety glasses with side shields that meet ANSI Z-87.1-2003 standards with **high Impact lenses** are required to be worn by all employees, trade partners and visitors while on McGough projects.

Scaffolds (Hazard 2.41)

All employees working on scaffolding work platforms over six feet high do not need to tie off if the following apply:

- The scaffolding platform is within 14 inches of the face of the wall.
- The outrigger platform is within 3 inches of the face of the wall.
- There is no unguarded opening in the face of the wall that creates a fall hazard greater than six feet, i.e., windows, doors, shafts, mechanical, architectural, etc.
- A complete guardrail system is provided on all remaining perimeter sides of the work platform.

All employees erecting/dismantling scaffolding more than one frame high shall be protected from falling by guardrail systems, safety net systems, or personal fall arrest systems.

Stairways and Ladders (Hazard 2.44)

- Personal Fall Protection shall be used if there is potential to fall to a level below the base of the ladder or for falls into moving equipment, machinery, or impalement hazards.
- If working on a ladder near an edge or opening, the employee shall be a distance equal to the height of the ladder plus four feet from the edge or opening or use a fall arrest or restraint system to prevent a greater fall distance.

Utilities (Hazard 2.49)

All utilities within the property boundaries shall be located (physically seen) to identify the exact location and depth, by vacuum excavation methods, at a minimum of every five feet.