

ATTACHMENT D, Part I
Subcontractor Safety, Health, and Environmental
Minimum Performance Standards (MPS)

Introduction

T. A. Woods Company strives to provide a safe and productive work environment. The following items are intended as a guide to help improve subcontractor compliance with environmental, health, and safety standards and recognition of safe work practices. If any items cited below conflict with state, federal, or owner-based policies, the most stringent shall prevail. This section is not intended as a complete safety program in itself. The items listed are safe work practices required to be followed by all subcontractors while working on this site.

1. General Expectations

Subcontractors shall develop and maintain safety, health, and environmental programs and procedures that meet or exceed federal, state, and local laws, regulations, and standards. The Subcontractor shall be able to provide reasonable documentation to demonstrate compliance with minimum performance standards (MPS).

Subcontractors shall make T.A. Woods Company immediately aware of any unique safety or environmental concerns related to their work and make timely efforts to notify other affected contractors working on the site and protect the public from hazards.

The MPS compliance shall be expected of any additional tier Subcontractors under the Subcontractor's control. Subcontractors shall be responsible for the content and cost of any training required by the MPS, and shall document that the training. This documentation will be provided to T.A. Woods Company upon request.

Subcontractors shall not relinquish or defer responsibility for project safety, health, and environmental compliance.

Subcontractors shall be responsible for costs related to fines and citations issued by regulating agencies to them and others caused by or related to their work.

Subcontractors shall perform and document pre-task planning to identify any hazards related to their work. This shall be available to T. A. Woods Company upon request.

2. Staffing Requirements and Expectations

Each Subcontractor shall designate a Competent Person as defined by OSHA to implement and enforce safety requirements. A Competent Person for each Subcontractor must be on site whenever the Subcontractor's employees are working. The Subcontractor shall provide documentation supporting the designation of Competent Person.

Based on size, complexity, hazards, and/or number of Subcontractor's employees on site, T.A. Woods Company may require the Subcontractor to assign a Designated Safety Person (DSP) to coordinate project safety requirements. The DSP must have knowledge sufficient to be able to identify hazards and the authority to correct them. All DSP's assigned to a T. A. Woods Company project must be approved by T. A. Woods Company's project team. If the project develops a Safety Committee, the Subcontractor shall make a representative available to participate.

Subcontractor shall provide an adequate number of First Aid/CPR certified employees to respond to emergency events. T. A. Woods Company shall be notified of any changes in First Aid/CPR staffing during the project.

3. Orientation and Training

Subcontractor's employees shall receive a site-specific orientation at initial assignment. Each Subcontractor employee, before starting work, will be required to be oriented by the T. A. Woods Company's project superintendent or designated personnel. Upon completion, the employee will sign an acknowledgement form and be provided a hardhat sticker issued by T. A. Woods Company, owner, or owner's representative.

Subcontractors are responsible for all safety, health, and environmental training related to work tasks. Documentation of training must be made available to T. A. Woods Company upon request. If an employee is found on site without having received the orientation, he/she will be removed from the project. Written notification will be provided to the subcontractor's business office. Repeated violations by the Subcontractor may result in discharge.

4. Meetings

Subcontractor shall conduct at minimum weekly safety meetings relevant to the work being performed and provide documentation of such. In addition Subcontractor's personnel will attend T. A. Woods Company's weekly safety training and SX3 Daily Safety/Production Huddles as designated.

T. A. Woods Company shall request the Subcontractor's attendance at preconstruction meetings and/or progress meetings with T. A. Woods Company project team. Supervisor's meetings will be conducted on site. The date and time of these meetings will be determined by the project superintendent or project manager. Attendance is required.

5. Daily Reports

Subcontractor is required to submit, on a daily basis, a Daily Report to the T. A. Woods Company's project superintendent or designated employee indicating:

- Name of Competent Person
- Name of employees working on site
- Position of each employee
- Description of work performed
- Names of vendors, suppliers or deliveries made

A daily report may be substituted for T.A. Woods Daily Report with approval prior to the start of work. Daily reports should be submitted prior to the end of each work day.

6. Barricades and Perimeter Protection

Subcontractor shall assure personnel understand the removal of barricades and other perimeter protection must have prior approval from the contractor erecting the barricade or perimeter protection.

Warning tape is commonly used on site to protect workers from hazards. Yellow tape is used to caution workers that a hazard exists, and red tape means the hazard is immediately dangerous to the worker's health and safety. Red tape will not be crossed unless safety controls will protect the employee from the hazards. Any worker crossing a red taped perimeter of a hazard without permission will be disciplined up to and including removal from the work site.

Barricades including guardrails are not to be removed or altered without permission from the contractor who installed the barricade or guardrail and T. A. Woods Company. Subcontractor's personnel are responsible for any barricade or perimeter protection removed due to their work and must replace the barricade, guardrails, or perimeter protection when work is completed. Subcontractor will be solely responsible for worker safety during the period of temporary removal.

7. Incident Reporting and Review

Subcontractor is responsible to immediately notify T. A. Woods Company of all incidents including accidents, near misses, personal injury, personal illness, property loss or damage, and incidents involving the owner, owner's representatives, building inhabitants, or the public and their property.

Subcontractor is required to investigate all incidents incurred by their employees or incidents resulting from their operations. Each Subcontractor shall provide T. A. Woods Company an incident investigation report as soon as possible but under no circumstances more than 2 hours after the occurrence. Subcontractor employees including site supervision, the DSP, the subcontractor's safety manager, and the employees involved in the incident will be required to meet with the T. A. Woods Company's safety manager following an incident to discuss the root cause and corrective measures to be taken.

Post-incident drug testing results will be presented to T. A. Woods Company prior to the return of the affected employees.

In the event of media involvement, Subcontractors will cooperate with T. A. Woods Company personnel. Questions will be deferred to T. A. Woods Company. All statements will be made by T. A. Woods Company.

8. Substance Use and Abuse Policy

The illegal use or abuse of drugs and/or alcohol constitutes a safety and health hazard to all workers. All workers are expected to report to work fit for duty and to perform work free of drugs, alcohol, and other substance which may affect safety. Subcontractor shall establish and maintain an effective substance use policy. At minimum drug and alcohol testing is required of Subcontractor employees in following situations:

- Suspicion employee is under the influence of drug and/or alcohol use
- Employee has caused, contributed, or been involved in a work-related incident resulting in or which has the potential to result in personal injury or property damage
- Employee has sustained a work-related injury
- Per site or project criteria as established by the owner or owner's representative

All costs associated with any substance testing are the responsibility of the Subcontractor.

9. Project Safety Inspections and Audits

Subcontractors shall conduct daily safety inspections of work areas and shall cooperate with any regulatory agency consultation or compliance inspections. Written safety audits or inspections shall be conducted regularly and documented. Documentation shall be available upon request to T. A. Woods Company. Any hazards found at the work site shall be immediately corrected and reported to T. A. Woods Company.

Subcontractors will be notified of any violations of safety regulations and safe work practices while working on a T. A. Woods Company site. Failure to correct conditions places the offending Subcontractor in violation of contract. This may result in progress payments being withheld until conditions noted are corrected. If the hazard is serious, T. A. Woods Company may be forced to stop all of the offending Subcontractor's work activities until the hazard is corrected at the subcontractor's expense. Subcontractors will be directed to remove from the project, any employee who refuses to comply with or has been repeatedly observed violating safety policies, procedures, and safe work behaviors.

10. Enforcement/Disciplinary Procedures

A plan for disciplinary action for violation of known safety requirements shall be part of Subcontractor's responsibility. Any Subcontractor employee, who is observed not complying with safe practices or in violation with project safety policies, procedures or safe work behaviors, will be subject to disciplinary action up to and including discharge from the project.

11. Fire, Flammable Materials, and Hot Work Procedures

The following items represent basic fire control procedures to be followed by Subcontractor:

- Flammable liquids and/or combustible solids are to be stored only in properly labeled, approved, closed, secured containers.
- Flammable liquids will not be stored in enclosed structures such as buildings, trailers, or sheds.
- Combustible waste materials are to be picked up and properly disposed of, at least once a shift and more often if necessary.
- Locate fire extinguishers within 20 feet of welding or burning operations. Subcontractors are required to supply task-based fire extinguishers on site. All fire extinguishers shall have an annual inspection completed and be inspected monthly. A tag or sticker on the fire extinguisher shall show the date of the last annual inspection and show proof of monthly inspections.
- Oxygen and acetylene cylinders are to be secured upright, stored separately (20' or more apart) and away from other combustible materials.
- Control or contain welding, cutting, and grinding sparks.
- Subcontractors are responsible for maintaining a Hot Work Permit at their worksite during any welding, cutting, or grinding operations.
- An independent fire watch shall be stationed at the work area and monitor all areas that may be effected by the welding, cutting, or grinding operation. The fire watch shall be trained in the use of a fire extinguisher and be stationed at the work area for a minimum of 30 minutes following the completion of work.
- Subcontractor creating the hazard(s) will provide controls to protect exposed employees, whether employed by subcontractor or other.
- The amount of flammable/combustible liquids stored for use in temporary containers shall be limited to what will be used in one shift and labeled according to Hazard Communication standards.
- Observe all No Smoking or No Open Flame signs

12. Housekeeping

Each Subcontractor is responsible for clean-up and removal of debris, excess material, trash, and tools on a daily basis. All work areas shall be maintained in a clean fashion and in compliance with good housekeeping procedures. Failure to perform this function on a timely basis or after appropriate notification will result in responsible Subcontractor(s) being responsible for costs incurred.

13. Hazard Communication

Subcontractor is responsible for the generation, management, and proper disposal of hazardous materials and waste. The Subcontractor agrees not to bring hazardous wastes on site or generate hazardous waste without the knowledge and consent of T.A. Woods Company.

Subcontractors (and tier subcontractors) are responsible for maintaining Hazard Communication standards and will submit upon request a Hazard Communication policy which incorporates employee notification and training in proper safety including use, exposure, safety controls and disposal of hazardous materials and supplies. The Subcontractor's Competent Person will be responsible for monitoring compliance.

A complete list of materials and supplies containing hazardous substances and Safety Data Sheets will be maintained by the Subcontractor and supplied to T. A. Woods Company no less than the first day said materials and supplies are brought to the site. Updating information will be the responsibility of the Subcontractor and will be provided to T. A. Woods Company.

14. Electrical Power Safety

Temporary power shall be protected by Ground Fault Circuit Interrupters (GFCI)

Temporary power cords shall be heavy duty construction grade. All cords (extension and tools) will be inspected daily prior to the start of the work shift. Damaged cords are to be tagged and removed from the job site immediately. If not removed, T. A. Woods Company shall remove the damaged cord to protect all workers.

Temporary lighting will be provided in accordance with the standards and contract requirements. Any additional lighting such as task lighting required will be provided by Subcontractor.

Permanent power shall be protected by Ground Fault Circuit Interrupters. On a permanent outlet, a cover plate will be attached in order for the outlet to be utilized. All live circuit panels must have a compliant panel cover.

15. Control of Hazardous Energy

When work is performed on equipment, including that of the owner or Subcontractor, controlled hazardous energy standards will be followed. Subcontractor whose work involves live equipment shall submit a plan for energized work or a Control of Hazardous Energy (Lock Out/Tag Out) plan. Work will commence upon approval by T. A. Woods Company.

16. Proximity of Utilities

Prior to start and during course of any work, Subcontractor shall make a thorough survey of entire site to determine type and location of utilities. Subcontractor shall verify information with T. A. Woods Company and shall coordinate work activities with the appropriate utility owner.

Appropriate clearance distances shall be maintained throughout the course of the work. If Subcontractor cannot maintain clearance, the utility must be contacted for alternative methods. Subcontractor is required to investigate any and all contingencies where contacting a utility could adversely affect any operation or render inoperative any protective apparatus in the surrounding area. Subcontractor is to submit a written procedure for protection or rerouting of critical systems and procedure will be turned in to T. A. Woods Company prior to work being performed.

17. Personal Protection Equipment

Subcontractor agrees to provide personal protective equipment (PPE) and adequate training for the use and maintenance of PPE to all employees as required by applicable OSHA standards.

At minimum, the following is required:

- Clothing – long pants and shirt with minimum of 4 inch sleeve. No shorts, tank tops, or any inappropriate article of clothing.
- Footwear – substantial protective toed boots will be worn, preferably full height laced work boots.
- Hard Hats – are to be worn 100% of the time, through all phases of construction and to be worn correctly.
- Eye/Face Protection – eye protection is to be worn 100% of the time and safety glasses must comply with ANSI requirements. Face protection will be worn when required including overhead drilling or

cutting, chipping, welding, burning, mixing or working with chemicals, grinding, or other tasks where flying particles are possible. Safety glasses will be worn with face shields.

- Gloves – hand protection is to be worn 100% of the time. Workers are allowed to be free of gloves to first digit of each finger.
- Hearing Protection – will be required in accordance with OSHA standards.
- Fall Protection – equipment must meet and be maintained in accordance with OSHA Subpart M.
- Respirators – if respirators are required, subcontractor must be in compliance with applicable OSHA standards and facility standards. When use of respirators is required, proof of appropriate testing and training will be submitted to T. A. Woods Company upon request.

Subcontractor is solely responsible to ensure employees wear the correct PPE for protection from hazards. T.A. Woods Company is not responsible for providing hard hats, safety glasses, gloves, or other applicable PPE to Subcontractor employees.

18. First Aid and Emergency Medical Facility

Subcontractor is to provide an appropriate First Aid kit that is maintained and stocked. The location of the kit(s) shall be known to employees. At minimum, one Subcontractor employee will be certified in First Aid and CPR.

Subcontractor is responsible for immediate access to a designated medical facility for use in an emergency, and shall provide T. A. Woods Company with this information. An effective emergency communication system is the responsibility of the Subcontractor.

19. Pre-Task Planning and Safety Plan

Each Subcontractor shall submit a site specific Safety Plan inclusive of Activity Hazard Analysis (AHA) or similar document. The AHA shall cover the general and specific work activities, all related hazards, and controls to be utilized to eliminate hazards.

The Safety Plan will be submitted to T. A. Woods Company and approved prior to the commencement of work. Subcontractor will review the site specific Safety Plan with all employees on site as part of the training requirements. Subcontractor is required to review and update the Safety Plan as necessary.

20. Fall Protection

T. A. Woods Company's fall protection policy requires all workers to be protected when exposed to falls of 6 feet or greater. In some instances per owner or site-specific hazards, fall protection may be required at lesser heights. A passive restraint system such as a guardrail system will be used unless impractical. When passive restraint systems are impractical, active systems such as a personal fall arrest system shall be used. Subcontractors are responsible for determining the proper anchor point. In all cases, Subcontractor will follow OSHA standards and safe work practices while employing a fall protection system.

Steel workers including metal decking Subcontractors are allowed under regulations to exceed minimum fall protection height as stated above while performing certain work. Steel workers and decking contractors will follow all the requirements for fall protection outlined in the OSHA standards. Prior to the installation of a steel structure, steel erection Subcontractors and decking Subcontractors are required to submit a project specific fall protection plan.

Subcontractors are responsible not to subject any other worker on site to falling objects resulting from work being performed by that subcontractor. Work areas below another worker are to be protected at all times.

All rebar or similar protrusions are to be capped or covered to prevent employees from the hazard. Unless otherwise agreed to by contract, the Subcontractor installing the rebar or other protrusion creating a hazard shall be responsible to eliminate the hazard by installing caps or troughs. Subcontractor installing caps or troughs is responsible to maintain them to not subject any worker to the hazard.

Any hole in the walking surface greater than 2 inches in size shall be covered, cover secured, and marked hole. The cover shall be sufficient in strength to withstand all loads that may be subjected to that surface including to but not limited to scissor lifts, tool bins, and personnel. Subcontractor who creates the hole is responsible to cover and maintain the cover until the hazard is eliminated.

Subcontractor work that necessitates the use of either Controlled Access Zone or Fall Protection Plan is required to submit plans to T.A. Woods Company prior to beginning work.

21. Ladders and Stairways

Ladders will be inspected daily prior to use. Damaged ladders must be tagged and removed from the project site. Ladders must have the manufacturer's decals including, height, safety precautions, and duty rating. Subcontractor is responsible for providing ladder training to employees.

Stairways must be kept free of flammable materials, stored materials, and other debris.

22. Crane Operations and Critical Lifts

All Subcontractors who operate or employ a crane on site shall be required to submit the following prior to work proceeding:

- Copy of crane operator's certification documents
- Current record of the crane
- Copy of subcontractor's liability policy or crane operator's liability policy
- Crane inspection record completed by qualified worker prior to commencement of work
- Critical lift pick plan

All documentation will be submitted to T. A. Woods Company for review prior to commencement of work.

Subcontractor will be required to participate in a pre-lift meeting at which time lifting procedures, crane selection and capabilities, rigging, load weights and configuration, and other pertinent items will be addressed.

Swing radius of the crane must be barricaded. No worker is permitted to work under or travel under a suspended load or be positioned such that a suspended load will swing over the worker. The subcontractor who is operating or employing the crane shall assure that no workers are exposed to a suspended load. No subcontractor shall allow his workers to work under a load or within the swing of the load that will subject the worker to the hazard.

23. Rigging and Material Handling

Rigging will be inspected prior to use and as necessary throughout the course of the work shift. If it is found to be worn or damaged, it shall be removed immediately. Rigging equipment will not be used beyond rated capacity.

Subcontractor will maintain materials in neat and orderly manner. Materials shall be stacked in a manner to prevent tripping, falling, shifting, or rolling. Material shall not be stored on dunnage or blocks, not directly on the ground.

24. Scaffolding

Scaffolding erected by a Subcontractor on site is the responsibility of that Subcontractor. The Subcontractor erecting a scaffold shall provide T. A. Woods Company the following:

- Name and training qualification of qualified and competent person
- Record showing the scaffold was approved for use by a competent person prior to any worker accessing the scaffold for the first time. Competent person inspection following erection.
- Daily inspection checklist and tagging by a competent person trained in scaffold inspections. The inspection shall be done daily and prior to anyone accessing the scaffold. Copy of inspection report shall be submitted to T. A. Woods Company
- Toe boards shall be installed on the perimeter of all scaffolds unless an alternative method of fall protection has been approved by T. A. Woods Company such as eliminating access and travel below the scaffold
- Training records for all workers who access the scaffold will be submitted to T.A. Woods Company upon request.
- Permission to use another contractor's scaffold shall be done in writing and a copy submitted to T.A. Woods Company prior to use by any contractor other than the erecting contractor.

25. Confined Space

Subcontractor's employees will not be allowed to enter a confined space unless regulations for confined space entry are followed. Subcontractor is responsible for atmospheric testing, identifying hazards, and controlling hazards in the confined space. Prior to entry of confined space, all Subcontractors are required to submit a Safety Plan including an AHA outlining the procedures to be followed to allow safe entry and work practices in compliance with OSHA standards at minimum. The copy of the Safety Plan will be submitted to T. A. Woods Company and approved prior to the commencement of work.

Confined space training records for all workers involved in the confined space entry and work will be submitted to T. A. Woods Company upon request.

26. Equipment Requirements

Subcontractor will maintain, equip, and operate all self-propelled construction equipment in accordance with safe work practices and manufacturer's requirements. Material-handling equipment must be equipped with ROPS (roll-over protection structure) and seat belts.

- Only trained and authorized personnel shall operate equipment
- Equipment shall be operated in accordance with manufacturer's specifications and requirements
- Personal Fall Arrest System will be used on aerial lifts
- If equipped with a seat belt, will be worn during operation
- Cell phone use is prohibited while operating equipment
- Operators shall conduct a pre-shift safety inspection of equipment
- Damaged or defective equipment is prohibited
- Workers shall not be transported or ride on equipment or vehicles not equipped with seats for passengers
- Operators not operating equipment safely or exhibiting a lack of ability to operate equipment safely will be prohibited from operating equipment on site

27. Excavation Work

Subcontractor engaged in excavation work shall have a designated Competent Person on site at all times. Name and qualifications will be submitted to T. A. Woods Company before work begins. No worker shall enter a trench unless it has been determined by the Competent Person to be properly excavated and protected against collapse by means of sloping, benching, shoring, sheeting, use of trench box, or other appropriate system. Trenches will be inspected daily by the Competent Person prior to entry or when a possibility of environmental or atmospheric change.

Excavations will have appropriate barricades and signage as a means of warning and protecting site workers of hazards. Excavations will be back-filled as soon as possible after the completion of the work. Subcontractor is responsible for location of underground items prior to commencement of excavation tasks.

28. Steel Erection

Subcontractor will submit a site-specific erection safety plan inclusive of fall protection prior to the start of work to T. A. Woods Company. When special or unusual hazards are encountered, the Subcontractor will clearly address these issues in the site-specific plan. Authorization to proceed shall be provided prior to the commencement of steel erection.

Welders shall use appropriate PPE including fall protection. Welders' certification shall be submitted to T.A. Woods Company prior to commencement of work.

29. Concrete and Masonry

All concrete, masonry, or other silica-generating cutting process must be done using wet methods.

Concrete Subcontractor or masonry Subcontractor when applicable are responsible for notifying T. A. Woods Company of any changes or modifications in anchor bolts and any issues related to concrete strength or performance.

30. Minimum Performance Standards Checklist – if applicable to this project, reporting checklist will be included with this document.

The checklist has been provided to assist in planning and implementation of the Subcontractor Safety, Health and Environmental Minimum Performance Standards (MPS).

At least 5 days prior to the start of subcontractor's on-site field mobilization, this checklist should be completed and submitted to T. A. Woods Company along with supporting compliance information. Failure to submit the required checklist and accompanying data may result in the withholding of progress payments due the subcontractor or may delay the start of work by the subcontractor.

The checklist addresses the need for action plans required to conform and respond to the MPS. Specifically, it requires a subcontractor to commit to the resources and timing for action (who, where, when, and how) necessary to effectively implement the MPS program.

The MPS checklist will be used as a joint tool for the Subcontractor and T. A. Woods Company to monitor and manage the Subcontractor's MPS implementation with specific assignments for program compliance and maintenance. It is also intended to provide clear assignment of accountability within the Subcontractor's team for the timing and individual responsibility of the MPS program.

Subcontractor management and personnel assigned to this project should be provided a copy of the subcontractor's general safety program and project specific MPS program.

Minimum Performance Standard Checklist

_____ The attached Minimum Performance Standard (MPS), Attachment D, Part II is required for this project. Please respond to all checklist questions and submit a signed copy to T. A. Woods Company

_____ Minimum Performance Standard (MPS), Attachment D, Part II is not required on this project.