

CMC Safety Procedures for Contractors

Introduction

The purpose of this manual is to define CMC's safety requirements of contractors employed to execute capital project work for CMC's facilities. This manual is not intended to define all rules and regulations, but rather to outline CMC specific requirements. Contractors do the direct hiring of the construction manpower and are directly responsible for the prevention of accidents in the workplace, personnel safety and training.

CMC's aim is for contractors to operate in such a way that no one gets hurt. This can be achieved if everyone believes SAFETY IS FIRST AT CMC and works together in a way that makes it happen!

Business Philosophy

A growing tradition based on upon a philosophy of individual effort, mutual respect, teamwork, fairness to all and the sound practice of:

- Producing at a profit while satisfying our customers;
- Recognizing and developing each individual;
- Working safely and maintaining a neat and orderly workplace;
- Finding pride, satisfaction and fun in what we are doing; and
- Always trying to improve our plant, our knowledge, our skills, our practices and ourselves.

Safety Philosophy

CMC's basic safety philosophy is to not take chances. Do not risk harm to yourself or your employees while you work. If you are unsure as to how to do a job without risk, ask CMC's designated manager or safety officer.

We encourage our contractors, subcontractors and their employees to develop good safe work habits from their very first day on the job; to concentrate on working safely and to talk with their workers and their supervisors about safe work practices.

We ask the attention and assistance of each contractor, subcontractor and their employees to help us continue to operate our facilities as safe comfortable places to work.

Responsibilities

The primary responsibility for all Contractors is hazard assessment, accident prevention and jobsite safety for all work. Without limiting the generality of the foregoing, the Contractor shall perform the following:

- 1) Contractors shall comply with all institution, Federal, State and Local government regulations.
- 2) Contractors shall adhere to their company's safety rules and regulations, as well as specific requirements identified and developed for the contracted work.
- 3) Contractors shall comply with the CMC requirements outlined in this manual.
- 4) Contractor shall develop and maintain an emergency response and evacuation plan.
- 5) Contractors shall conduct weekly toolbox safety meetings.
- 6) Contractor shall investigate and report all accidents, including near misses, and report to CMC's project manager or safety officer within 24 hours of the occurrence.
- 7) Contractor's shall ensure that subcontractors comply with all safety requirements of CMC.

Administration

Contractors are required by law to maintain and report accidents to appropriate institution and the State in which the work is being performed. It is the responsibility of the contractor to complete these reports in a timely manner.

Contractors must submit a hard copy of the Contractors Safety, Health and Environmental Protection manual prior to starting any work.

Contractors shall document their weekly toolbox meetings and forward meeting minutes to the CMC Safety Officer. The CMC Safety Officer shall periodically attend and participate in the contractor Toolbox meetings.

The contractor is also responsible for completing and submitting a CMC Environmental, Health and Safety report on a monthly basis.

Standards of Good Conduct

CMC has worked together over the years on a "live and let live" basis. We get along well with each other and our business and community associates. Our standards of personal conduct help us to do this. They are simple and reasonable and present no burden to a person of goodwill.

However, there are certain limitations on personal behavior that are necessary in every company to help ensure a safe and orderly operation. Although good conduct is primarily a matter of common sense and judgment, it is helpful to list some of the rules that most vitally affect employee welfare.

All CMC employees, contractors, subcontractors and their employees are expected to abide by company rules and regulations. CMC may request a contractor employee discharge from the plant/site for a variety of reasons, including but not limited to the examples of the offenses or violations described on the following pages.

The following are examples of offenses or violations which are contrary to the rules of good conduct:

- 1) Possession, sale, distribution and/or use on company premises, including parking lots, of all illegal drugs or other mind altering substances, intoxicants, alcoholic beverages, "look-alike" (simulated) drugs, and related drug paraphernalia or literature related to illegal drug or substance use.
- 2) Reporting to work and/or working under the influence of alcohol.
- 3) Using illegal drugs on or off the job.
- 4) Use, possession or display of weapons or explosives on company premises.
- 5) Insubordination. (Refusing to obey orders from supervision, management, or failure to follow instructions.)
- 6) Violation of safety, security or plant protection practices.
- 7) Theft.
- 8) Unauthorized possession, use or removal of any property belonging to CMC, to a contractor, or to a customer of the CMC.
- 9) Fighting or disorderly conduct.
- 10) Abuse or destruction of property belonging to CMC or another contractor.
- 11) Defacing, removing or destroying CMC or another contractor's property.
- 12) Giving false, incomplete or incorrect information on a company document or a document provided to the CMC, including for example, falsifying drug and alcohol test results.
- 13) Unauthorized or destruction of CMC information or records.
- 14) Horseplay on the premises.
- 15) Gambling on premises.
- 16) Excessive absenteeism and/or tardiness, as defined in our policy.
- 17) Failure to work safely.
- 18) Sleeping on duty.
- 19) Entering an unauthorized area.
- 20) Using unauthorized plant exit or entrance.
- 21) Forced entry into areas without authorization.
- 22) Violation of the CMC's policy concerning distribution and solicitation.
- 23) Causing or contributing to unnecessary waste.
- 24) Racial, ethnic age, religious, disability and/or sexual harassment, intimidation or discrimination.
- 25) Refusal to cooperate in an internal investigation, including the refusal to submit to a drug and/or alcohol screening test.
- 26) Threatening, intimidating, coercing or interfering with others.
- 27) Testifying falsely or reporting falsely against CMC, its operation, or its activities.
- 28) Failing to promptly report an accident; falsifying a claim or report concerning a personal injury, illness, or vehicular accident.
- 29) Refusing inspection of vehicle, locker, desk, tool box or personal property by CMC security personnel.
- 30) Loitering in buildings and work areas before or after work hours.
- 31) Violation of harassment, workplace violence or drug and alcohol policies.

General Safety Requirements

This manual and the Contract documents specifics certain obligations of the contractor. Compliance to these safety regulations shall include any and all responsibilities for violations incurred from inspections performed by any agency of any political subdivision including municipal, county, state, or federal. The contractor's obligations shall also include, but not be limited to the following safety rules which apply to the contractor, subcontractors, and their employees.

- 1) Reporting to work under the influence of or consumption or possession of intoxicating beverages, or possession, sale or use of narcotics, barbiturates, or other drugs or marijuana on duty or on company property is prohibited.
- 2) CMC expects contractors to administer and enforce rules and policies concerning alcohol and drug usage by their employees at least as stringent as those specified in CMC's Alcohol, Drug and Controlled Substances Policy.
- 3) Hazards created by work being performed (excavations, holes, hand railings and platforms removed, etc.) will be clearly marked, barricaded, flagged, etc. as appropriate.
- 4) No power switch, energy source, circuit breaker, disconnect, etc. will be opened or closed without previous notification to and authorization by the CMC Electrical General Foreman, the CMC Manager of Maintenance and Construction, or an individual designated by one of these. This will not, however, prevent or prohibit contractor employees from testing or trouble-shooting circuits and equipment under their control during installation or construction.
- 5) Never enter an operating area without authorization or until being familiarized with that area. Use authorized and designated access-ways, walkways, routes, etc.
- 6) Obey all warning signs and notices posed in various areas of company property and operating areas.
- 7) Welding leads, torch hoses, extension cords, etc. should be coiled and stored clear of walking and traffic areas when not in use.

- 8) When using equipment and/or tools that are the property of CMC, the contractor is responsible for the return of this equipment and/or tools to its proper storage area in safe, operable condition. Any defects or damage to this equipment and/or tools must be reported to the CMC Inventory Control Supervisor, CMC personnel in this area, or CMC Maintenance Supervision.
- 9) Contractor services are engaged at CMC because they are specialists in their field. It is the responsibility of the contractor to perform all elements of the assigned work in a professional and workmanlike manner. This specifically includes safety supervision of contractor's or sub-contractor's employees and controlling the job so that they utilize any and all necessary safety precautions and/or devices required to perform the work in a safe manner.

Drug, Alcohol and Controlled Substance Policy

CMC is firmly committed to providing and maintaining a safe, healthful and productive work environment -- free from the effects of alcohol and drugs -- for its employees and others having business with the company.

Consistent with the spirit and intent of this commitment, CMC has established further its intentions regarding the use of alcohol, illegal drugs and controlled substances in the workplace.

Policy

It is the policy of CMC that contractors, subcontractors and their employees shall not:

1. Use illegal drugs on or off the job; report to work with detectable levels of prohibited drugs or other substances, be involved with the unlawful use, possess, sale, manufacture or transfer of illegal drugs.
2. Report to work under the influence of alcohol, passes alcoholic beverages in the workplace or consume alcoholic beverages in the workplace or during working time.

Implementation

Contractors shall follow the CMC Substance Abuse Program which includes on-site drug testing. Pre-employment, random, post-accident and for-cause testing shall be implemented by the Contractor at their cost. Upon request, CMC may audit the Contractor's Monthly Substance abuse test log.

The substances and items covered by this policy include alcoholic beverages and all illegal drugs or other mind altering substances, including for example; but not limited to, marijuana, cocaine, narcotics, amphetamines, barbiturates, hallucinogens, inhalants, designer and synthetic drugs, "look alike" substances, prescription drugs or "over the counter" drugs (except as approved by this policy) and equipment, paraphernalia or literature related to illegal drug or substance abuse.

All Contractors and subcontractor employees shall be subject to random testing, including supervisors and managers. The selection of employees to be tested shall be made "randomly"; with all contractor employees having an equal opportunity to be selected. All contractor employees shall be tested without prior notice.

Individual testing may be required when CMC has reasonable suspicion that drugs or alcohol may be affecting a Contractor employee's conduct, attendance, performance, safety record and/or productivity. Individual testing may also be required as a part of an investigation.

Violation of this policy shall result in immediate discharge from CMC property.

Personal Safety Equipment

Required Use

All persons in plant operating areas are required to wear a hard hat, safety glasses with side shields and safety boots. Some jobs will require additional personal protective equipment (i.e., hoods when welding, goggles when cutting/burning, respirators when painting, etc.). The contractor and contractor's supervisor are responsible to determine the proper personal protective equipment is appropriate and necessary for their employees and assuring that such equipment is used.

Required Care

Contractors are responsible for keeping their employees' personal protective equipment in good serviceable condition. Worn, damaged, or faulty equipment cannot provide the protection for which it was designed.

Safety Glasses

Safety glass lenses should be replaced when they become scratched or pitted as these defects destroy the safety quality of the lenses. Shaded lenses are permitted outdoors but clear glasses are required under roof. Shaded lenses (sunglasses) must not be used in place of cutting goggles when cutting or burning because the insufficient protection can result in injury to the eyes.

Hard Hats

Hardhats are required at all times. Hardhats must be worn brim forward. Employees who are welding, cutting or grinding and wearing appropriate face shields shall be exempted from this requirement while they are performing the work. There shall be no "Soft-Top" welding; Welding helmets and shields must mount on the hard hats.

Clothing

Jewelry or loose clothing that might get caught in rotating or moving machinery is not permitted. Trousers with flared or frayed cuffs should not be worn. Shorts and cutoffs are prohibited. Long sleeved shirts are to be worn in the operating areas where protection is needed against heat, sparks, etc. Clothing made of 100% polyester material should not be worn because of the fire hazard. Contractors are responsible to inform their employees what is safe and appropriate to wear in a particular area.

Hearing Protection

Hearing protection shall be provided and used when the employees are exposed to noise exposures in excess of legal rules limits.

Mobile Equipment

Simply stated, it is the contractor's responsibility to ensure that vehicles or equipment are operated so that they can be stopped immediately. It is the contractor's sole responsibility to prevent his vehicles coming in contact with other vehicles, stationary objects and pedestrians. Operating speed must take into consideration – size of mobile equipment, load, climate, light versus dark, pedestrian traffic and other vehicles.

Drive safely on CMC property, observing warning signals and traffic laws with regard for both pedestrian and vehicular traffic laws. Passing of other moving vehicles is not allowed.

There are many overhead and boom-equipped cranes throughout CMC plants. Be alert and stay well clear of suspended loads. Never stand or pass beneath any load.

Stay clear of rotating or moving equipment to avoid becoming entangled or being struck.

Do not operate equipment that is not in approved, safe, operating condition! Equipment operators are responsible for inspecting equipment and for reporting any defects or unsafe conditions before operating.

Do not operate equipment for which you are not qualified.

When operating any crane, never transport a load over an employee or equipment. Do not use boom cranes for transporting equipment or materials. They are designed for lifting and positioning loads.

Boom cranes should not be operated when there are electrical storms in the immediate area.

There are overhead high voltage lines in several locations. Do not operate boom cranes until you are certain there are no electrical lines in the area.

The only riders permitted on mobile equipment are those for whom a seat is provided. When authorized as safe by the responsible supervisor, pickup trucks may be used to carry personnel to remote plant areas. When riding in the pickup bed, personnel must sit on the floor with the tailgate closed.

When a crane or other equipment with masts or extensions enters a CMC plant site, care shall be taken to maintain proper clearance from high voltage lines that pass through the property.

Other Equipment and Tools

Use

Do not use any tool or piece of equipment unless . . .

Trained and qualified in its use, and it is the right tool for the job; and

It has been inspected to assure it is totally serviceable.

Fire Extinguishers

Contractors shall provide fire extinguishers whenever their work requires a torch, welder or other hot equipment.

Tie-Off and Ladders

CMC requires mandatory tie-off for all Contractor employees working at elevations greater than 1 meter".

Only one person at a time should be on a ladder.

Use a ladder only when it is properly secured and positioned for access to elevated or below ground levels.

Metal ladders are prohibited due to the danger of electrical shock.

Compressed Gas & Cylinders

Always secure to a fixed object or fixture away from any source of heat; move compressed gas cylinders to a safe location when welding or cutting/burning operations must be performed in their vicinity. Never allow a welding rod, electrode, or any other part of welding equipment to contact a compressed gas cylinder, so as to make the cylinder become a part of the electrical circuit when welding.

Always close cylinder valves and bleed the pressure off the regulators at the end of the shift and when the equipment is not in use.

Always install a protective cap on a cylinder which has no regulator.

Always use a cart or designated rack to transport cylinders.

Never use oxygen for personal cleaning or for cleaning parts or equipment.

Never direct compressed gas toward another individual.

Storage

Coil and store all welding leads, torch hoses, air hoses and extension cords not in use on the fixture provided and off the ground.

Heaters

Do not stand so close to heaters that clothing may ignite.

Equipment Guards

Help assure all moving parts of fans are properly guarded. Report missing guards to CMC's Manager of Maintenance and Construction.

Contractor Parking and Pedestrian Traffic

Contractor and subcontractor employees shall park in the assigned contractor parking lot and follow the designated foot path to/from the construction site.

Contractor employees must be trained to stay out of production areas without consent of the CMC Area Supervisor.

Contractor carts, including golf carts, must have an orange flag that extends at least 2' above the cart. If the cart is used before sunrise or after dusk, the carts shall be equipped with a lighted beacon.

Emergency Response and Accident Reporting

An emergency route to a local hospital must be incorporated into all Contractor Site Specific Safety Program.

All accidents shall be reported to CMC's safety officer and project manager immediately. Accident reports must be submitted to CMC within 24 hours. Contractors are advised to send a copy of their accident reports to their Site Safety Coordinator.

In the event of a serious accident, consideration shall be given to the distribution of reports due to potential legal ramifications.

Hot Work

Hot works must be executed as per existing Safety Procedures.

Barricades

All red barricades/tape must be labeled with the Company, the Foreman in charge, the date the barricade/tape is erected and the specific hazard to which the barricade/tape applies.

When the hazard is no longer present, it is the responsibility of the foreman who erected the red barricade/tape to remove and appropriately discard the used barricade/tape.

Contractor Coordination Meetings

CMC may hold daily contractor coordination meetings with all contractors. The primary purpose of the meeting will be to discuss the activities for the day and to coordinate any contractor or owner activities to minimize hazards and exposures.