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I. General Requirements

This system is intended to provide the HUPM and General Contractor with the basic guidelines for implementation of a construction-specific Safety Management System including policy, processes, instruction, and documentation. This system focuses heavily on project management at all tiers, employee participation, planning, plan implementation, internal analysis and improvement, and management review. The goal of the Safety Management System is a project where continual improvement, no matter the duration of the construction project, is key to the success of the project.

II. University Construction Safety Goals

The University's Construction Projects Review Committee and Construction Management Council have established a set of campus-wide goals and objectives for all construction projects conducted at or on behalf of the University. Contractors of every tier are encouraged to establish an additional set of goals and objectives that exceed the items listed below.

A. Each project will establish and clearly communicate to all project Employees the goal of zero fatalities and debilitating injuries.

B. The overall project goal for DART injuries/illnesses will be twenty-five percent (25%) lower than the most recent DART rate (as of project inception date), as published by the Bureau of Labor and Statistics, for the North American Industry Classification System (NAICS) Code 23 – Construction. This goal shall be clearly communicated to all project staff and Employees. Project Management shall review the current DART rate as part of the Monthly Management Safety Meeting.

C. The overall project goal for TRC injuries/illnesses will be twenty-five percent (25%) lower than the most recent TRC rate (as of project inception date), as published by the Bureau of Labor and Statistics, for the North American Industry Classification System (NAICS) Code 23 – Construction. This goal shall be clearly communicated to all project staff and Employees. Project Management shall review the current TRC rate as part of the Monthly Management Safety Meeting.

Any projects not meeting the above-listed goals for a period of greater than 30 days shall develop and implement a ‘recovery plan’ with the purpose of meeting or exceeding the goal(s). This plan shall comply with Section IV of this Exhibit. This plan shall include a description of methods, policy amendments, procedures, responsibilities, and an implementation schedule for the actions required to obtain the established goal(s). It is the responsibility of the General Contractor to oversee the development and implementation of this plan, and to monitor the progress made towards achieving the established goal(s). This plan shall be reviewed and updated/amended monthly by the project management team until the goals have been met or achieved.

III. Accountability Plan

A. The General Contractor shall implement an Accountability Plan for the project. The Accountability Plan shall include disciplinary procedures to be utilized where compliance by a Contractor or Employee is not met.

IV. Annual Program Evaluation and Improvements Plan

A. Each project greater than one (1) year in duration shall evaluate the state of the safety program at a minimum of once annually. The General Contractor shall coordinate and chair a meeting with project management (including the HUPM & HUEHS) team to evaluate and review the project’s performance from the date of inception. This meeting shall be repeated once per year on or about the date of inception.
B. The **General Contractor**, in consultation with HUEHS (and the insurance broker for OCIP projects), shall compile the data and documents required to perform the evaluation. The following criteria and performance shall be evaluated:

1. Comparison of project injury experience to the most current benchmark;
2. Review of incidents involving lost or restricted time, and public incidents;
3. Comparison of anticipated loss ratios versus actual loss ratios;
4. Compliance with the project safety inspection expectations;
5. Review of the project compliance ratings, by category;
6. Effectiveness of the Incident Review process (repeat injuries);
7. Effectiveness of the project’s training and orientation program;
8. Status and effectiveness of the Employee Participation Program;
9. Effectiveness of project-wide communications related to safety; and,

C. The last action of the program evaluation meeting shall be to determine actions for the improvement of the project safety program, where elements of the program are determined to be sub-standard or ineffective. The meeting chair, along with the attendees, shall develop a list of actions, responsibilities, and required implementation times. This list, along with the meeting minutes, shall be published to each meeting attendee. The meeting minutes and action list shall be distributed to each project **Contractor** for review with their project employees.

D. The **General Contractor** shall track the progress of the action list until all actions have been completed and effected. Where action item requirements are not met, the HUPM and HUEHS reserve the right to meet with the **General Contractor** to determine the reason for the inaction, and a recovery plan shall be developed by the **General Contractor**, in consultation with the HUPM and HUEHS.

V. Communication of Safety-Related Items

A. The **Project Safety Manager** shall be responsible for communication of safety-related items to the entire project, including the HUPM and **Contractors** of every tier. Communications shall be made under the following circumstances, at a minimum:

1. Where an incident occurs on the project, including injury (where medical treatment is required, OSHA recordable, or more severe), property damage, or near miss;
2. Where trends or elevated frequencies in minor injuries are observed or noted (e.g. minor lacerations, foreign objects in the eye, etc.);
3. Where trends in safety compliance are noted or observed (i.e., via compliance reports or by visual observation);
4. Where established benchmarks, including incident rates or loss ratios are not met;
5. Any time a recovery plan for a certain operation or project is implemented;
6. Following the annual safety program evaluation and improvements meeting.

B. The communication shall be either delivered verbally to the project during the Monthly Mass Safety Meeting (for minor items) or shall be in writing via a Safety Bulletin issued by the **Project Safety Manager**. Where issued via Safety Bulletin, it shall be distributed to all project **Contractors** to be used as a Tool Box Talk by each **Contractor**.

VI. Competent Persons

A. A **Competent Person**, as defined by OSHA29CFR Part 1926.32(f) is required where **Contractors** are performing any of the activities listed below. The **Competent Person** is responsible for inspection of the operations for which he/she is listed as the **Competent Person**, as well as identification and correction of hazards.

B. Each **Contractor**, of every tier, is required to identify in writing the name of the **Competent**
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Person assigned to the project, specifically for the following areas:

1. Aerial Lifts; Asbestos; Bolting/Riveting/Fitting; Concrete/Forms/Shoring; Confined Space Entry; Cranes/Derricks; Demolition; Electrical/LO/TO; Excavation/Trenching; Fall Protection; First Aid/CPR; Forklift Trucks; Hazardous Materials/Waste Handling; Hearing Conservation; Ladders; Lead; Material Handling; Rigging; Scaffolding; Welding/Cutting.

C. Prior to commencement of project activities, each Subcontractor must complete the Competent Person Identification Form (available on the HUEHS website) and submit this form to the General Contractor for the project files. Re-submission of the Competent Person Identification Form is required any time the Competent Person or alternate changes.

D. For each Contractor, regardless of tier, the Competent Person Identification Form shall be used to deliver a Tool Box Talk to the project workforce, describing the roles and responsibilities of the Competent Person(s), as well as identification of the Competent Person(s) specific to that project. This Tool Box Talk shall be re-delivered as necessary when changes to the project workforce are made.

VII. Emergency Management Plan

A. The General Contractor shall develop a program, specific to that project’s operations, which meets or exceeds the guidelines listed in the HUEHS Standard. This program shall be updated and re-issued as conditions (i.e. location of firefighting equipment or changes in project personnel) change. The Harvard Construction Emergency Management Plan Worksheet (available on HUEHS website) may be used to satisfy this requirement. NOTE: Depending upon the complexity and scope of the project, the Harvard Construction Emergency Management Plan Worksheet may need to be supplemented with additional information. It is the responsibility of the General Contractor to assess this need. At a minimum, this program must address/list/identify the following:

1. Preparation for emergency response, including orientation and training;
2. Mock emergency drills, including coordination and frequency (no greater than every six (6) months).
   NOTE: (1) Where an actual drill cannot be performed due to project location restrictions (i.e. occupied structures), a scenario (table top) drill shall be performed at the same frequency, with all parties participating;
   NOTE: (2) If an actual emergency occurs, its documentation and lessons learned can be used to satisfy this requirement
3. Roles and responsibilities for the project action team;
4. First Aid policy and procedures;
5. External communication of an emergency;
6. Internal (project) communication during an emergency;
7. Contact names and numbers for project personnel and emergency services;
8. Control of the site during emergency responses, including emergency response access;
9. First hour response procedures (at least up through turnover to the responding emergency response group and/or Incident Commander);
10. Location(s) of emergency and spill containment equipment located on the project;
11. Evacuation procedures, including signaling of evacuation, rally points, and re-entry;
12. Incident Investigation procedures, reporting, and forms;
13. External entity involvement (OSHA, Insurance Company);
14. Project security measures. Project security measures shall comply with contract documents, but at a minimum, reasonable security precautions shall be implemented by the General Contractor to prohibit intrusion into project areas.

B. Emergencies and their associated responses must be individually planned for in advance. Each type of possible or anticipated emergency shall include a list of actions, the responsibilities for the actions, and the listed roles of project personnel. At a minimum, the following items must be addressed in the Emergency Management Plan:

1. Incidents involving injury to personnel, including bodily injury and death;
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2. Incident involving injury to the public or students;
3. Incidents involving damage to property, public and project;
4. Collapse of a building or portion thereof;
5. Bomb threats, security risks, or terrorist attacks;
6. Fire and explosion;
7. Utility failures and associated events;
8. Equipment failure such as crane collapse or loss of load;
9. Workplace violence events;
10. Natural disasters (hurricane, flood, earthquake) and severe weather events;
11. Environmental releases;
12. Events involving media coverage;

C. The Emergency Management Plan shall be submitted to the HUPM upon completion. The plan shall be reviewed with each project team member and worker as part of the orientation process, at a minimum. Where the plan is changed or updated, it shall be reviewed with all project staff and workers.

VIII. Employee Involvement Plan

A. The General Contractor shall ensure the active participation of project management and staff, subcontractor management, staff, and labor forces, and labor force representatives.

B. For projects greater than $25,000,000 in value, the General Contractor’s Project Manager and Project Safety Manager shall establish a Project Safety Committee. The Safety Committee shall consist of representation by the following, at a minimum:
   1. The general contractor Project Manager;
   2. The general contractor Project Safety Manager;
   3. Trade stewards (one per each trade);
   4. Tradesmen (at least one per each contractor on the project). The tradesman shall either be selected voluntarily by the employer, or where volunteers are not provided, shall be selected by the employer;
   5. Contractor Safety Representatives, where required by this Exhibit.

C. The Safety Committee shall meet no less than once per month. The Safety Committee meeting shall be coordinated and chaired by the Project Safety Manager, and the meeting shall be documented. The meeting shall consist of the following, at a minimum:
   1. Review of incidents and accidents from the previous month, including corrective actions and responsibilities;
   2. Review of upcoming project operations and activities;
   3. Review of the current project safety performance (incident rates, SafetyNet, etc.);
   4. Communication of Safety Bulletins from the previous month;
   5. Participation by the attendees where project hazards observed by the attendee are discussed and reviewed;
   6. Participation by the attendees regarding feedback from the tradesmen;
   7. A project walkthrough focused on identification of best practices and non-compliant conditions and practices.

D. The minutes from the Safety Committee meeting shall be distributed to each attendee, each project Contractor, and the HUPM.

E. The general contractor Project Manager or Project Safety Manager may elect to establish other employee participation programs in addition to the Safety Committee. These may include anonymous employee suggestion boxes, recognition programs, etc.

IX. Project Hazard Analysis

A. The General Contractor is required to develop a Project Hazard Analysis (PHA) prior to commencement of work. The PHA shall identify the following: major hazards anticipated as they
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relate to the scope of work (these shall be broken down by either project phase or by contractor), methods the General Contractor will employ to manage/mitigate/abate/reduce the hazards, and the responsibility for each of the management/mitigation/abatement/reduction techniques.

B. The PHA shall be submitted to the HUPM upon completion.

X. Project Inspections

A. It is ultimately the responsibility of the general contractor’s Project Manager(s), Project Superintendent(s), and Project Safety Manager(s) to assure safe working conditions and practices are employed at the project. At a minimum, walkthrough-type inspections shall be conducted at prescribed frequencies, dependent upon the role of the individual. Formal inspections shall be documented by the inspector using inspection software, where applicable, written reports, and photographs. Following each inspection, communications shall be made to the responsible parties/Contractors, and the documentation shall be forwarded. Where life-threatening conditions or practices are observed, the observer has the obligation to cease the activity or practice until corrective measures are implemented. Where life-threatening conditions or practices are observed, the observer shall contact the Project Safety Manager following the observation. Work may not resume until the Project Manager, Project Safety Manager, contractor manager/Superintendent/Foreman, and responsible person have agreed to and completed the corrective action(s).

B. Where life-threatening or high-severity hazards are identified by either the owner or the General Contractor, the non-compliant Contractor shall complete a Non-Compliance Corrective Action Plan. The intent of this requirement is to identify the (1) highlight the seriousness of the observation to management, (2) identify the root cause of the incident, (3) identify and implement corrective action(s), and (4) involve the Contractor’s management in the process.

XI. Reporting

A. The General Contractor shall compile and/or prepare all reports associated with incidents or injuries occurring on or related to the project. The preparation of reports may be the responsibility of another employer or Contractor but shall be overseen and distributed by the General Contractor.

B. Incident/injury reports include the following:
   2. OCIP (or other insurance company) Claims Reports (Worker’s Compensation, General Liability, Auto Liability, Builder’s Risk, Property, etc.)
   3. The Harvard Construction Supervisor’s Incident/Accident Investigation Report may be used to satisfy this documentation requirement;

C. All incident/accident/injury reports shall be sent to the required insurance company, per their policy guidelines, with copies of the reports distributed to the HUPM or his designee for the project files.

D. Each Contractor shall submit a Monthly Safety Report, specific to the project, through a Harvard-sponsored, web-based program (CSAP). This Monthly Safety Reporting program can be accessed through http://www.ehs.harvard.edu/tools.

E. The Monthly Safety Report contains the following information:
   1. Summary of accidents/incidents from the previous month;
   2. The number of man-hours worked during the previous month;
   3. Summary of accountability actions (safety violations, dismissals, and fines issued);
   4. Project events and inspections.

F. The Monthly Safety Report shall be issued by the 10th of the month, for the previous month’s activities.
XII. Safety Representation/Project Coverage

A. Any project valued at greater than $25,000,000 will be required to provide a full-time, dedicated Project Safety Manager. This person may not hold other duties. The Project Safety Manager shall have a minimum of seven (7) years’ experience in construction safety, shall possess the OSHA 30-Hour Construction Safety Outreach Training, and shall hold a current certification in First Aid and CPR. The General Contractor shall submit the resume of the Project Safety Manager, for review, to the HUPM and HUEHS (and Program Safety Director if OCIP) prior to commencement of construction operations. The resume shall include at least three (3) references from an owner or developer.

B. Any project valued at less than $25,000,000 where high-hazard activities requires that a safety professional participate in the planning for the operation(s) and conduct a documented inspection of the operation at least daily. The minimum qualifications for the safety professional shall be those outlined in XII A above.

C. Any project valued at less than $25,000,000 will be required to designate a Project Safety Manager.

D. The Owner reserves the right to require the General Contractor to provide additional Safety Representatives dependent upon the size and scope of the project.

E. Each Contractor shall designate at least one person to serve as Safety Representative.

F. The Project Safety Manager and Safety Representative shall be on site on a full-time daily basis from the time of mobilization onto the project, through the completion of the final punch list. Coverage shall be provided during all project activities, including after-hours work and weekends.

G. Any potential relief from the requirements outlined in this section shall be made on a case-by-case basis through consultation with the HUPM and the HUEHS. The request for relief from the General Contractor or Contractor shall be in writing and shall document the reason(s) that relief is being sought.

XIII. Safety Meetings

A. Annual Program Evaluation and Improvements Plan Meeting
   1. Each project shall hold a Program Evaluation and Improvements Plan Meeting at least once per year. The meeting shall be conducted in accordance with Section IV of this Exhibit.

B. High Hazard Planning Meeting
   1. Prior to commencement of each high hazard operation conducted on the project, the General Contractor shall coordinate and chair a High Hazard Planning Meeting.
   2. The general contractor’s Project Manager, Project Safety Manager, General Superintendent, and Area Superintendent (if assigned), the subcontractor’s Project Manager, Safety Representative, and Foreman shall attend this meeting. The HUPM and HUEHS shall be invited to attend this meeting.
   3. At a minimum, the following activities/operations require that a High Hazard Planning Meeting be held:
      a. Critical Lifts
      b. Energized Electrical Work
      c. Hazardous Waste Remediation or Abatement
      d. Leading Edge Work
      e. Precast Concrete Erection
      f. Scaffold Erection
      g. Steel Erection (meeting shall also comply with 29CFR Part 1926.752)
      h. Structural Demolition
   4. The High Hazard Planning Meeting shall address the policies, procedures, coordination, communication, and training that will be required or employed during the activity. The meeting shall be documented, and meeting minutes shall be distributed by the General Contractor.
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to all attendees.

C. Monthly Management Safety Meeting

1. The general contractor Project Manager and Project Safety Manager shall coordinate and co-chair a Management Safety Meeting at least once per month.

2. The following persons shall attend the meeting:
   a. General Contractor Project Manager
   b. General Contractor Project Safety Manager
   c. General Contractor Project Superintendents
   d. Subcontractor Safety Representatives
   e. Subcontractor Foremen and Competent Person
   f. Union Stewards (where applicable)

The HUPM and HUEHS shall be invited to attend the Monthly Management Safety Meeting.

3. The following shall be reviewed at the Monthly Management Safety Meeting:
   a. Review of incidents and accidents from the previous month, including corrective actions and responsibilities;
   b. Review of upcoming project operations and activities – pre-planning;
   c. Review of the current project safety performance (incident rates, SafetyNet, etc.);
   d. Communication of Safety Bulletins from the previous month;
   e. Training and discussion on a special safety topic, pertinent to the project.

4. The meeting shall be documented, and meeting minutes shall be distributed by the General Contractor to all attendees. Each Contractor shall use the minutes of the meeting to conduct a tool box talk with their respective employees.

D. Monthly Mass (All Hands) Safety Meeting

1. The general contractor’s Project Safety Manager shall coordinate and chair a Mass Safety Meeting at least once per month. This meeting may be held in the field or in a room large enough to safely hold the number of attendees. This meeting is expected to be concise and brief.

2. All project Employees, staff, and management shall attend this meeting. The HUPM and HUEHS shall be invited to attend the Monthly Mass Safety Meeting.

3. The following shall be reviewed at the Monthly Mass Safety Meeting:
   a. A brief review of incidents and accidents from the previous month, including corrective actions and responsibilities;
   b. Distribution of Safety Bulletins from the previous month;
   c. A brief training session on a special safety topic, pertinent to the project.

4. A meeting outline shall be distributed to each attendee at the meeting. Where comments or suggestions are provided by an attendee during the meeting, the suggestion/comment shall be documented and addressed.

E. Monthly Safety Committee Meeting

1. Each project greater than $25,000,000 in volume shall hold a Safety Committee Meeting at least once per month. The meeting shall be conducted in accordance with Section VII of this Exhibit.

F. Owner/Architect/Contractor (OAC) Meeting

1. On projects where OAC meetings are held, the attendees shall be briefed on the status of the project safety program, including milestones, achievements, injuries and incidents, and upcoming activities by the general contractor Project Manager or Project Safety Manager. It is advantageous to the efficiency of the meeting that safety be the first topic discussed.

G. Pre-Construction Safety Meeting

1. The General Contractor shall coordinate and chair a Pre-Construction Safety Meeting for each Contractor (of all tiers) working on the project. This meeting shall be held at least two (2) weeks prior to the commencement of the work by the Contractor.

2. The following persons shall attend this meeting:
   a. General Contractor Area Superintendent
b. General Contractor **Project Safety Manager**
c. Subcontractor **Project Manager**
d. Subcontractor **Superintendent**
e. Subcontractor **Foreman** and **Competent Person**
f. Subcontractor **Safety Representative**

3. The Pre-Construction Safety Meeting shall review and address the following:
   a. **Competent Person** Requirements
   b. Coordination and logistics
c. Electrical Safety
d. Emergency Response Procedures and Meeting Locations
e. Environmental Requirements
f. Equipment Inspections
g. Fall Protection Requirements and Practices
h. Fire Prevention and Protection Requirements and Practices
   i. High-hazard activities
   j. Housekeeping Requirements
   k. Incident/Accident reporting procedures
   l. Insurance Requirements
   m. Major Requirements of this Exhibit (applicable to the **Subcontractor**)
   n. Material Deliveries and Storage
   o. SDS Locations and Program Requirements
   p. Pre-Qualification Requirements
   q. Project Disciplinary Action Requirements
   r. Project Goals
   s. Project Safety Representation/Coverage
t. Public Protection Requirements and Practices
   u. Recordkeeping
   v. Safety Meetings
   w. Subcontractor’s general scope of work
   x. Submittals required by the **Subcontractor** (**HASP**, **Competent Person**, HazCom, etc.)
   y. Training

4. The meeting shall be documented, and meeting minutes shall be distributed by the **General Contractor** to all attendees.

H. Weekly Coordination and Safety Meeting
   1. On projects where, Weekly Coordination Meetings (often referred to as **Foremen’s Meetings**) are held, the attendees shall be briefed on the status of the project safety program, including milestones, achievements, injuries and incidents, and upcoming activities by the general contractor **Project Manager** or **Project Safety Manager**. It is advantageous to the efficiency of the meeting that safety be the first topic discussed.

XIV. **Training**

A. General Requirements
   1. Training requirements shall comply with 29CFR Part 1926.21, other applicable requirements, and the requirements of the HUEHS Construction Standard, at a minimum.
   2. Training of employees is ultimately the responsibility of the employer.
   3. Each employer shall maintain records of training, and these records shall be produced upon request. Where employees demonstrate an inadequate level of the training or understanding, the **General Contractor** shall require the employer to conduct additional training.
   4. All **Employees** on University Projects shall possess an OSHA 10-Hour Construction Safety Outreach Training card. Training cards will be presented during the orientation, and copies
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made. Employees without this certification will have 30 days from the date of his or her initial entry to undergo this training and produce the training card.

5. All Supervisors, Foremen, and Safety Representatives on University Projects shall possess an OSHA 30-Hour Construction Safety Outreach Training card. Training cards will be presented during the orientation, and copies made. Supervisors, Foremen, and Safety Representatives without this certification will have 30 days from the date of his or her initial entry to undergo this training and produce the training card.

B. Orientation

1. The General Contractor shall develop a Safety Orientation Program, specific to the project. The Safety Orientation Program shall address and review the following items, at a minimum:
   a. Project Safety Goals
   b. Aerial Lift Use Requirements
   c. Competent Person Instructions
   d. Confined Space Permit and Procedures
   e. Lock-Out/Tag-Out Requirements
   f. Electrical Safety
   g. Emergency Response Procedures
   h. Environmental Requirements
   i. Equipment Inspection and Safety
   j. Excavation Requirements
   k. Fall Prevention and Protection Requirements
   l. Fire Prevention and Protection Requirements
   m. Hazard Communication and Container Labeling
   n. Housekeeping Requirements
   o. Incident/Accident Procedures and Reporting
   p. Project Disciplinary Action Program
   q. Safety Inspection Criteria
   r. Personal Protective Equipment Use and Limitations
   s. Public Protection
   t. Safety Management Systems Requirements and Practices
   u. Scaffold Requirements
   v. Signs, Signals, and Barricades Requirements
   w. Substance Abuse Policy Guidelines
   x. Training Requirements (OSHA 10/30, etc.)

2. Each employee entering the project shall undergo the Safety Orientation within twenty-four (24) hours of entry onto the project.

3. Each employee who has undergone the Safety Orientation shall receive a sticker for the placement on the outside of the hardhat that clearly identifies satisfactory completion of the Orientation. In addition, each employee shall receive a copy of the orientation for their records and use.

4. The General Contractor shall maintain a log of all persons who have undergone the Safety Orientation, including the name, signature, date, and trainer's name.

C. Pre-Task Planning

1. For each task or operation undertaken at the project, the Competent Person or Safety Representative for each Contractor shall compile a PTP.

2. The PTP shall break down the operation or task into basic job steps, shall identify the hazards associated with each job step, and shall identify the hazard control measures associated with each hazard. The PTP shall also include a checklist of major items to be addressed in every PTP. The Harvard Example Pre-Task Plan Form may be used to satisfy the documentation for this requirement.

3. Following completion of the PTP, and prior to commencement of the task or operation, the PTP must be submitted to the general contractor's Area Superintendent and Project Safety
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Manager for review, comment, and approval.

4. The approved PTP shall be used to conduct a Pre-Task Plan Meeting with the employees who will perform the work covered under the PTP and shall be conducted in the field by the Competent Person or Foreman. Each attendee shall be instructed as to the requirements listed in the PTP and shall acknowledge this training by signing the PTP.

5. The PTP will be amended and resubmitted where the operation or job steps change. Where changes are made and approved, the Pre-Task Plan Meeting shall be conducted again.

6. The PTP shall be posted in the immediate work area and shall be produced upon request.