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Streamform

Contractors, LLC

Safety Program

1. INTRODUCTION AND COMPANY COMMITMENT

1.1 Company Profile - Streamform Contractors

Streamform Contractors is a general construction contractor based in Texas, specializing in commercial and residential construction projects[1]. Founded in 2010, our company has grown to become a trusted name in the construction industry throughout Texas[2]. We provide a wide range of construction services including new construction, renovations, and specialty projects[3].

Company Information:

- Legal Name: Streamform Contractors, LLC
- Address: 1234 Builder’s Lane, Houston, TX 77001, United States

- Phone: +1 (713) 555-0198
- Website: www.Streamformcontractors.com
- License Number: TX-GC-12345
- Number of Employees: 75
- Service Area: Throughout Texas with focus on Houston, Dallas, Austin, and San Antonio metropolitan areas[4]

Our Services:

- Commercial Construction
- Residential Construction
- Renovation and Remodeling
- Design-Build Services
- Construction Management
- General Contracting[5]

1.2 Safety Policy Statement

Streamform Contractors is committed to providing a safe and healthy workplace for all employees, subcontractors, clients, and visitors. We believe that all accidents are preventable, and no task is so important that it cannot be done safely. Our goal is to achieve zero incidents and injuries through continuous improvement of our safety program and practices.

This Safety Program has been developed to establish guidelines and procedures that will help us maintain a safe working environment. It is designed to comply with all applicable federal, state, and local regulations, including OSHA standards for the construction industry.

The safety and health of every person on our job sites is our highest priority[11]. We are committed to:

1. Complying with all applicable safety and health regulations and industry standards
2. Providing necessary resources to maintain safe working conditions
3. Ensuring all employees receive proper safety training
4. Continuously improving our safety performance
5. Involving all employees in our safety program

6. Holding everyone accountable for safety

This Safety Program applies to all Streamform Contractors employees, subcontractors, and visitors at our job sites. All individuals are expected to follow these safety guidelines and procedures at all times.

1.3 Management Commitment to Safety

The management of Streamform Contractors is fully committed to providing a safe and healthy workplace for all employees[20]. We recognize that our employees are our most valuable asset, and their safety and wellbeing are essential to our success[21].

Our commitment to safety is demonstrated through:

1. Leadership Involvement: All levels of management, from the CEO to project supervisors, are actively involved in promoting safety and setting a positive example.
2. Resource Allocation: We provide adequate resources, including time, personnel, and funding, to implement and maintain an effective safety program.
3. Accountability: Safety performance is a key factor in evaluating the performance of all employees, including managers and supervisors.
4. Open Communication: We encourage open communication about safety concerns and suggestions for improvement.
5. Continuous Improvement: We regularly review and update our safety program to ensure it remains effective and addresses emerging hazards.

Management will:

- Establish safety goals and objectives
- Provide necessary resources to achieve safety goal
- Ensure compliance with all applicable regulations
- Review safety performance regularly
- Take appropriate action to address safety concerns
- Recognize and reward safe behavior
- Hold all employees accountable for safety

1.4 Safety Program Goals and Objectives

The primary goal of Streamform Contractors' Safety Program is to prevent workplace injuries, illnesses, and property damage[34]. We strive to create a culture where safety is integrated into every aspect of our operations[35].

Our Safety Goals:

1. Zero Incidents: Achieve and maintain zero recordable injuries, illnesses, and property damage incidents.
2. Regulatory Compliance: Ensure 100% compliance with all applicable safety and health regulations.
3. Employee Involvement: Achieve active participation from all employees in safety initiatives and programs
4. Continuous Improvement: Regularly evaluate and improve our safety performance and practices
5. Safety Culture: Foster a positive safety culture where safety is a core value shared by all employees

Specific Objectives for 2025:

1. Reduce our Total Recordable Incident Rate (TRIR) to below industry average
2. Achieve 100% completion of required safety training for all employees
3. Conduct monthly safety audits at all active job sites
4. Implement a near-miss reporting program with a goal of 100% reporting
5. Reduce the severity of incidents through early intervention and proper hazard control
6. Increase employee participation in safety committees and initiatives
7. Develop and implement job-specific safety procedures for high-risk activities

These goals and objectives will be reviewed annually and updated as needed to ensure continuous improvement in our safety performance.

1.5 Definitions and Terminology

The following definitions and terminology are used throughout this Safety Program:

Accident: An unplanned event that results in injury, illness, property damage, or other loss.

Competent Person: An individual who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Hazard: Any condition or practice that could cause an injury, illness, or property damage.

Incident: An unplanned event that could have resulted in injury, illness, property damage, or other loss.

Job Hazard Analysis (JHA): A technique that focuses on job tasks to identify hazards before they occur and determines appropriate controls.

Near Miss: An incident that did not result in injury, illness, or damage, but had the potential to do so.

OSHA: Occupational Safety and Health Administration, the federal agency responsible for enforcing workplace safety and health regulations.

Personal Protective Equipment (PPE): Equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses.

Risk: The probability that a hazard will result in an accident or injury, combined with the severity of the injury or damage that may result.

Safety Data Sheet (SDS): A document that contains information on the potential hazards of a chemical product and how to work safely with it.

Toolbox Talk: A short safety discussion or meeting at the beginning of a work shift that focuses on a specific safety topic.

Total Recordable Incident Rate (TRIR): A mathematical calculation that describes the number of recordable incidents per 100 full-time employees in a given time frame.

2. SAFETY PROGRAM ADMINISTRATION

2.1 Safety Program Organization

Streamform Contractors has established a structured approach to safety management to ensure that our Safety Program is effectively implemented and maintained. Our safety organization is designed to provide clear lines of authority and responsibility for safety at all levels of the company.

Organizational Structure:

1. Executive Level:

    o President/CEO o Vice President

    of Operations o Safety Director

2. Project Level:

    o Project Managers o Site

    Superintendents o Safety

    Coordinators

3. Field Level:

    o Foremen o Crew

    Leaders o Individual

    Workers

4. Support Level:

    o Safety Committee o

    Human Resources o

    Training Coordinator

This organizational structure ensures that safety is integrated at every level of the company, from executive management to individual workers. Each level has specific responsibilities for implementing and maintaining the Safety Program.

2.2 Roles and Responsibilities

President/CEO

- Establish the company's safety policy and objectives
- Provide necessary resources for the Safety Program
- Review safety performance regularly
- Demonstrate visible commitment to safety
- Hold all employees accountable for safety performance

Safety Director

- Develop, implement, and maintain the Safety Program
- Ensure compliance with all applicable regulations
- Conduct regular safety audits and inspections

- Investigate accidents and incidents
- Provide safety training and resources
- Track and analyze safety performance metrics
- Recommend improvements to the Safety Program
- Serve as the primary contact for regulatory agencies

Project Managers

- Ensure implementation of the Safety Program on their projects
- Allocate resources for safety on their projects
- Include safety in project planning and scheduling
- Review safety performance of their projects
- Address safety concerns promptly
- Support the Site Superintendent in safety matters

Site Superintendents

- Implement the Safety Program at the job site
- Conduct daily safety inspections
- Ensure all workers receive site-specific safety orientation
- Conduct regular safety meetings and toolbox talks
- Enforce safety rules and procedures
- Identify and address hazards promptly
- Report accidents and incidents immediately
- Maintain required safety documentation

Foremen/Crew Leaders

- Ensure their crew works safely and follows procedures
- Conduct daily pre-task safety briefings
- Inspect tools and equipment before use
- Report hazards and safety concerns

- Ensure proper use of PPE by their crew
- Participate in accident investigations

Individual Workers

- Follow all safety rules and procedures
- Use required PPE properly
- Report hazards, near misses, and incidents
- Participate in safety training and meetings
- Refuse to perform unsafe work
- Look out for the safety of coworkers
- Suggest safety improvements

Safety Committee

- Review safety performance and trends
- Identify safety concerns and recommend solutions
- Participate in accident investigations
- Review and update safety procedures
- Promote safety awareness and participation

2.3 Safety Committee Structure

Streamform Contractors has established a Safety Committee to promote employee involvement in the Safety Program and to assist in the development and implementation of safety initiatives.

Committee Composition:

- Safety Director (Committee Chair)
- Management Representatives (2-3 members)
- Worker Representatives (3-5 members from various trades/positions)
- Project Representatives (1-2 rotating members from active projects) Selection Process:
- Management representatives are appointed by the President/CEO

- Worker representatives are selected through a combination of volunteering and nomination Project representatives rotate every 3-6 months to ensure diverse input Term of Service:
- Committee members serve for a term of one year
- Terms are staggered to ensure continuity
- Members may serve consecutive terms Meeting Schedule:
- The Safety Committee meets monthly
- Special meetings may be called as needed
- Minutes are recorded and distributed to all employees Committee Responsibilities:

1. Review safety performance and incident trends
2. Review accident and near-miss reports
3. Conduct periodic safety inspections
4. Recommend improvements to the Safety Program
5. Review and update safety procedures
6. Promote safety awareness and participation
7. Address employee safety concerns
8. Assist in safety training and communication

2.4 Documentation and Recordkeeping

Proper documentation and recordkeeping are essential components of an effective Safety Program. Streamform Contractors maintains comprehensive records to document safety activities, track performance, and demonstrate compliance with regulatory requirements.

Required Records:

1. OSHA Recordkeeping:
    - o OSHA 300 Log of Work-Related Injuries and Illnesses o OSHA 300A Summary of Work-Related Injuries and Illnesses o OSHA 301 Injury and Illness Incident Report o Records must be maintained for at least 5 years

2. Training Records:
    - Employee safety orientation o Job-specific safety training o Specialized training (fall protection, confined space, etc.) o Toolbox talks and safety meetings o Records must include date, topic, attendees, and instructor
3. Inspection Records: o Daily job site inspections o Weekly safety audits o Equipment inspections o Regulatory compliance inspections o Records must include date, location, findings, and corrective actions
4. Hazard Assessments:
    - Job Hazard Analyses (JHAs) o PPE hazard assessments o Site-specific safety plans o Records must be updated when conditions change
5. Incident Records:
    - Accident investigation reports o Near-miss reports o Property damage reports o Root cause analyses o Corrective action plans
6. Exposure Monitoring: o Air sampling results o Noise monitoring o Other exposure assessments o Records must be maintained for duration of employment plus 30 years
7. Medical Records:
    - Audiometric testing o Respiratory fit testing o Medical surveillance o Records must be kept confidential and maintained for duration of employment plus 30 years
8. Equipment Records: o Equipment inspection logs o Maintenance records o Certification documents o Records must be maintained for the life of the equipment

Record Retention:

- All safety records will be maintained for the minimum required time period, as specified above or by applicable regulations

- Records will be stored in a secure location with limited access
- Electronic records will be backed up regularly Record Access:
- Employees have the right to access their own training and medical records
- Current OSHA 300A summaries will be posted from February 1 to April 30 each year
- Records will be made available to regulatory agencies upon request

2.5 Program Review and Evaluation

To ensure the continued effectiveness of our Safety Program, Streamform Contractors conducts regular reviews and evaluations. This process helps identify strengths, weaknesses, and opportunities for improvement.

Annual Program Review:

- Conducted by the Safety Director and Safety Committee
- Includes review of all elements of the Safety Program
- Evaluates compliance with regulatory requirements
- Assesses effectiveness in preventing injuries and illnesses
- Identifies areas for improvement
- Results in a written report with recommendations

Performance Metrics:
The following metrics are tracked and analyzed to evaluate safety performance:

1. Total Recordable Incident Rate (TRIR)
2. Days Away, Restricted, or Transferred (DART) rate
3. Near-miss frequency
4. Safety inspection findings and closure rates
5. Training completion rates
6. Employee participation in safety activities
7. Regulatory citations or violations Continuous Improvement Process:

1. Collect safety performance data
2. Analyze trends and patterns

3. Identify areas for improvement
4. Develop action plans
5. Implement changes
6. Monitor effectiveness
7. Adjust as needed Program Updates:

- The Safety Program will be updated at least annually
- Updates will address changes in: o Regulatory requirements o Company operations o Industry best practices o Identified hazards o Lessons learned from incidents
- All updates will be communicated to employees
- Training will be provided on significant changes Management Review:
- Executive management will review safety performance quarterly
- The annual program review report will be presented to executive management
- Management will provide direction and resources for program improvements

3. COMPLIANCE AND ENFORCEMENT

3.1 Safety Rules and Regulations

Streamform Contractors has established a comprehensive set of safety rules and regulations to ensure a safe working environment for all employees, subcontractors, and visitors. These rules are based on OSHA regulations, industry best practices, and company-specific requirements.

General Safety Rules:

1. All employees must follow safety rules, procedures, and instructions from supervisors.
2. Report all unsafe conditions, near misses, and incidents immediately.
3. Proper personal protective equipment (PPE) must be worn at all times as required for the task.
4. No horseplay, fighting, or other disruptive behavior is permitted on job sites.
5. Possession or use of alcohol, illegal drugs, or other intoxicants is strictly prohibited.
6. Only authorized and trained personnel may operate equipment and vehicles.
7. All tools and equipment must be inspected before use and used only for their intended purpose.

8. Keep all work areas clean, organized, and free of hazards.
9. Know the location of emergency equipment, exits, and procedures.
10. Attend all required safety meetings and training sessions.

Job Site Rules:

1. All visitors must check in with the site superintendent and receive a safety briefing.
2. Hard hats, safety glasses, and appropriate footwear are required in all construction areas.
3. High-visibility vests are required when working around vehicles and equipment.
4. Fall protection is required when working at heights of 6 feet or more.
5. Trenches and excavations deeper than 5 feet must have protective systems.
6. All electrical equipment must be properly grounded and protected by GFCI.
7. Scaffolds must be erected, inspected, and used according to regulations.
8. Ladders must be secured and used properly.
9. All chemicals must be properly labeled and stored.
10. Fire extinguishers must be accessible and unobstructed.

Regulatory Compliance:

Streamform Contractors complies with all applicable safety and health regulations, including but not limited to:

1. OSHA Construction Standards (29 CFR 1926)
2. OSHA General Industry Standards (29 CFR 1910) as applicable
3. Texas state-specific safety requirements
4. Local building codes and regulations
5. Industry consensus standards (ANSI, NFPA, etc.)

3.2 Disciplinary Procedures

Streamform Contractors has established a disciplinary program to ensure compliance with safety rules and procedures. The purpose of this program is to encourage safe behavior and correct unsafe actions before they result in accidents or injuries.

Disciplinary Process:

The disciplinary process is progressive and includes the following steps:

1. Verbal Warning:
    - First minor violation o Documented in employee's file o Includes coaching on correct procedures
2. Written Warning:
    - Repeated minor violations or more serious violation o Formal documentation with specific details o Includes retraining on applicable safety requirements o Employee must sign acknowledgment
3. Final Written Warning:
    - Multiple violations or serious safety infraction o May include suspension without pay o Mandatory safety retraining o Clear statement that further violations will result in termination
4. Termination:
    - Continued violations after previous warnings o Single violation of sufficient severity o Willful disregard for safety rules

Major Safety Violations:

Certain violations are considered major and may result in immediate termination, regardless of prior disciplinary history:

1. Working while impaired by drugs or alcohol
2. Fighting or violence on the job site
3. Theft or willful damage to property
4. Deliberate removal or disabling of safety devices

5. Deliberate failure to use required fall protection
6. Unauthorized operation of equipment
7. Falsification of safety records or reports Administration of Discipline:

1. All disciplinary actions will be administered fairly and consistently.
2. Supervisors are responsible for enforcing safety rules and initiating disciplinary action.
3. The Safety Director and Human Resources will review all disciplinary actions.
4. Employees have the right to appeal disciplinary actions through established procedures.
5. All disciplinary actions will be documented and maintained in employee files.

3.3 Employee Recognition Program

Streamform Contractors believes that recognizing and rewarding safe behavior is as important as correcting unsafe behavior. Our Employee Recognition Program is designed to encourage and reinforce positive safety performance.

Recognition Categories:

1. Individual Recognition:
    - o Perfect safety record o Reporting hazards and near misses o Safety improvement suggestions o Going above and beyond in safety efforts
2. Crew/Team Recognition:
    - o Achieving safety milestones o Outstanding safety performance o Exemplary housekeeping o Successful completion of high-risk work without incidents
3. Project Recognition:

- o Completion of project with zero recordable incidents o Meeting or exceeding safety goals o Exceptional safety audit results

Recognition Methods:

1. Immediate Recognition: o Verbal praise and acknowledgment o Safety recognition cards o Small tokens of appreciation (safety-themed items)
2. Monthly Recognition:
   - o Safety Employee of the Month o Safety Team of the Month o Recognition in company newsletter o Gift cards or other rewards
3. Annual Recognition:
   - o Safety Excellence Awards o Years without recordable incidents o Perfect attendance at safety meetings o Significant contributions to safety program o Monetary bonuses or other substantial rewards

Program Administration:

1. Supervisors are responsible for identifying and nominating employees for recognition.
2. The Safety Committee reviews nominations and selects recipients for monthly and annual awards.
3. Recognition is presented publicly to maximize impact and visibility.
4. The program is reviewed annually to ensure effectiveness and employee engagement.

3.4 Subcontractor Management

Streamform Contractors is committed to ensuring that all subcontractors working on our projects maintain the same high standards of safety as our own employees. Our Subcontractor Management Program establishes requirements and procedures for selecting, managing, and evaluating subcontractors.

Prequalification Process:

Before a subcontractor can work on a Streamform Contractors project, they must complete a prequalification process that includes:

1. Submission of safety performance data: o TRIR and DART rates for the past three years o EMR (Experience Modification Rate) o OSHA citation history o Workers' compensation information
2. Submission of safety program documentation:
    - o Written safety program o Training records o Competent person certifications o Specialized program elements (fall protection, confined space, etc.)
3. Completion of safety questionnaire addressing:
    - o Safety management structure o Safety training programs o Incident investigation procedures o Drug and alcohol policy

Subcontractor Requirements:

All subcontractors working on Streamform Contractors projects must:

1. Comply with all applicable safety regulations and Streamform Contractors' safety requirements
2. Attend pre-construction safety meetings and site-specific orientations
3. Provide competent supervision for their work activities
4. Conduct regular safety inspections of their work areas
5. Participate in project safety meetings and toolbox talks
6. Report all incidents, near misses, and hazards immediately
7. Maintain required safety documentation on site
8. Cooperate with safety audits and inspections Performance Monitoring:

Subcontractor safety performance is monitored through:

1. Daily observations by Streamform Contractors' supervisors
2. Weekly safety inspections
3. Monthly safety performance reviews

4. Incident tracking and analysis
5. Participation in safety activities

Enforcement and Corrective Action:

1. Safety violations by subcontractors will be documented and addressed immediately.
2. Repeated or serious violations may result in:

   o Written warnings o Mandatory

   retraining o Removal of specific

   workers o Financial penalties o

   Termination of contract
3. Subcontractors with poor safety performance may be removed from the approved vendor list.

Annual Evaluation:

Subcontractors are evaluated annually based on:

1. Safety statistics and performance metrics
2. Compliance with safety requirements
3. Responsiveness to safety concerns
4. Participation in safety initiatives
5. Overall safety culture and commitment

4. HAZARD IDENTIFICATION AND ASSESSMENT

4.1 Job Hazard Analysis Procedures

Job Hazard Analysis (JHA) is a systematic process used to identify, evaluate, and control hazards associated with specific job tasks. Streamform Contractors uses JHAs to prevent workplace injuries and illnesses by addressing hazards before work begins.

JHA Development Process:

1. Select the Job:

- Jobs with high injury or illness rates o Jobs with potential for severe injuries o New jobs or processes o Jobs affected by changes in procedures or equipment o Complex or non-routine tasks

2. Break Down the Job:
   - Divide the job into a sequence of steps o Be specific but not too detailed o Include enough steps to identify all potential hazards o Observe the job being performed when possible
3. Identify Potential Hazards: o For each step, identify what could go wrong o Consider all types of hazards:
   - Physical (falls, struck-by, caught-in/between)
   - Chemical (toxic substances, irritants)
   - Biological (infectious materials)
   - Ergonomic (repetitive motion, awkward postures)
   - Environmental (weather, temperature)
   - Electrical (shock, arc flash)
4. Determine Preventive Measures:
   - Apply the hierarchy of controls:
     - Elimination (remove the hazard)
     - Substitution (replace with less hazardous alternative)
     - Engineering controls (redesign, guards, ventilation)
     - Administrative controls (procedures, training, scheduling)
     - Personal protective equipment (last line of defense)
5. Document the JHA:

- Use the standard JHA form o Include all steps, hazards, and controls o Obtain approval from the Safety Director o Distribute to affected employees

JHA Implementation:

1. Review the JHA with all workers involved in the task before work begins.
2. Ensure all required controls are in place and functioning.
3. Verify that workers understand the hazards and control measures.
4. Post the JHA in the work area for reference.
5. Use the JHA as a training tool for new employees.

JHA Review and Update:

JHAs must be reviewed and updated:

1. When a job changes or new equipment is introduced
2. After an accident or near miss related to the job
3. When new hazards are identified
4. At least annually to ensure continued effectiveness

4.2 Workplace Inspections

Regular workplace inspections are a critical component of Streamform Contractors' hazard identification and assessment program. These inspections help identify hazards before they cause injuries or illnesses and ensure compliance with safety regulations.

Inspection Types and Frequency:

1. Daily Inspections:
    - Conducted by supervisors and foremen o Focus on high-risk areas and activities o Brief visual inspection of work areas, tools, and equipment o Immediate correction of identified hazards
2. Weekly Inspections:

- Conducted by site superintendents o Comprehensive inspection of entire job site o Documented using standard inspection checklist o Follow-up on previous findings

3. Monthly Inspections:
   - Conducted by the Safety Director or designee o In-depth evaluation of safety program implementation o Review of documentation and records o Verification of corrective actions
4. Quarterly Inspections:
   - Conducted by the Safety Committee o Focus on systemic issues and program effectiveness o Evaluation of safety culture and employee engagement o Recommendations for program improvements
5. Special Inspections:
   - After incidents or near misses o Before starting high-risk activities o When new equipment or processes are introduced o In response to employee concerns

Inspection Process:

1. Preparation:
   - Review previous inspection reports o Gather appropriate checklists and tools o Notify affected personnel o Review applicable regulations and standards
2. Conducting the Inspection:
   - Use standardized checklists o Observe work practices and behaviors o Inspect equipment,

tools, and materials o Review documentation and records o Interview employees about safety concerns o Document all findings with photos when appropriate

3. Documentation:
    - Complete inspection forms o Categorize hazards by severity and priority o Assign responsibility for corrective actions o Establish deadlines for completion o Submit report to appropriate personnel
4. Follow-up:
    - Track corrective actions to completion o Verify effectiveness of controls o Communicate results to affected employees

Update hazard assessments and JHAs as needed

Inspection Checklists:

Streamform Contractors uses standardized checklists for different areas and activities, including:

1. General site safety
2. Fall protection
3. Electrical safety
4. Scaffolding
5. Excavation and trenching
6. Heavy equipment
7. Personal protective equipment
8. Fire prevention
9. Hazardous materials
10. Tools and equipment

4.3 Safety Audits

Safety audits are formal, systematic evaluations of Streamform Contractors' Safety Program to assess compliance with regulations and effectiveness in preventing injuries and illnesses. Audits are more comprehensive than inspections and focus on management systems and program elements.

Audit Types:

1. Internal Audits:
    - o Conducted by the Safety Director or qualified internal personnel o Scheduled quarterly for each active project o Focus on program implementation and effectiveness
2. External Audits:
    - o Conducted by third-party safety professionals o Scheduled annually o Provide objective evaluation and benchmarking
3. Compliance Audits:

- o

- o Focus on regulatory compliance o Verify documentation and recordkeeping o Identify potential regulatory issues

4. Program Audits:

- o Evaluate specific program elements (fall protection, hazard communication, etc.) o Assess effectiveness and implementation o Identify opportunities for improvement

Audit Process:

1. Planning:

- o Define scope and objectives o Develop audit protocol and questions o Select audit team members o Schedule audit activities o Notify affected personnel

2. Conducting the Audit:

- o Opening meeting to explain process o Document review (policies, procedures, records) o Interviews with management and employees o Field observations o Verification of program implementation

3. Reporting:

- o Compile findings and observations o Identify strengths and weaknesses o Develop recommendations for improvement o Prepare formal audit report

  Present findings to management

4. Corrective Action:

- o Develop corrective action plan for deficiencies o Assign responsibilities and deadlines o Allocate resources

for implementation o Track progress to completion o Verify

effectiveness of corrective actions

Audit Focus Areas:

1. Management commitment and leadership
2. Employee involvement and participation
3. Hazard identification and assessment
4. Hazard prevention and control
5. Emergency response planning
6. Accident investigation and analysis
7. Safety training and communication
8. Program evaluation and improvement
9. Documentation and recordkeeping
10. Regulatory compliance

4.4 Hazard Reporting System

Streamform Contractors has established a hazard reporting system to encourage employees to identify and report potential hazards before they cause injuries or illnesses. This system is a critical component of our proactive approach to safety management.

Reporting Methods:

1. Verbal Reports:
    - Immediate reporting to supervisor for urgent hazards o Documentation by

    supervisor on hazard report form
2. Written Reports:
    - Hazard Report Forms available at all job sites o Submission to supervisor

    or Safety Director o Option for anonymous reporting
3. Electronic Reports:

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- o Online reporting system accessible via company website o Mobile app for smartphone reporting o Email submission to safety@Streamformcontractors.com

4. Safety Suggestion Box:
   - o Located at each job site and main office o Checked daily by designated personnel o All submissions reviewed and addressed

Reporting Process:

1. Hazard Identification:
   - o Employee identifies potential hazard o Determines severity and urgency o Takes immediate action if possible to mitigate risk
2. Report Submission:
   - o Employee completes hazard report form o Includes location, description, and suggested corrective action o Submits report through appropriate channel
3. Report Processing:
   - o Reports are logged in hazard tracking system o Assigned priority level based on risk assessment o Routed to responsible personnel for action
4. Investigation and Response:

   Designated person investigates reported hazard o Determines appropriate corrective action o Implements temporary controls if needed o Develops permanent solution
5. Feedback and Follow-up:
   - o Reporter receives acknowledgment within 24 hours o Status updates provided throughout resolution process o Final resolution communicated to reporter and affected employees o Verification that hazard has been effectively controlled

Non-Retaliation Policy:

Streamform Contractors strictly prohibits retaliation against any employee who reports a safety hazard or concern. Employees are encouraged to report all hazards without fear of reprisal. Any form of retaliation will result in disciplinary action up to and including termination.

Hazard Tracking and Analysis:

1. All reported hazards are entered into a tracking system
2. Trends and patterns are analyzed monthly
3. Common or recurring hazards receive priority attention
4. Systemic issues are addressed through program improvements
5. Summary reports are provided to management and the Safety Committee

5. ACCIDENT INVESTIGATION AND REPORTING

5.1 Accident Reporting Procedures

Prompt and accurate reporting of all accidents, incidents, and near misses is essential for preventing future occurrences and ensuring proper care for injured employees. Streamform Contractors requires immediate reporting of all workplace incidents, regardless of severity.

Reporting Requirements:

All of the following must be reported immediately:

1. Work-related injuries and illnesses, regardless of severity
2. Property damage incidents
3. Near miss incidents (events that could have caused injury or damage)
4. Environmental releases or spills
5. Fire or explosion incidents
6. Vehicle accidents
7. Security breaches or workplace violence Reporting Process:

1. Initial Notification:

    - Employee reports incident to supervisor immediately o Supervisor

    ensures injured employees receive proper medical attention o Supervisor notifies

- o

Safety Director within 1 hour of incident o Safety Director notifies management as appropriate

2. Emergency Response:
    - o Call 911 for serious injuries or emergencies o Administer first aid for minor injuries o Secure the scene to prevent further injuries o Implement emergency action plan if necessary
3. Documentation:
    - o Supervisor completes Incident Report Form within 24 hours o Injured employee completes Employee Statement Form o Witnesses complete Witness Statement Forms o All forms submitted to Safety Director
4. Regulatory Reporting:
    - o OSHA notification within 8 hours for fatalities o OSHA notification within 24 hours for hospitalizations, amputations, or loss of an eye o Workers' compensation carrier notification within 24 hours

Other agencies as required by regulation

Medical Treatment:

1. For emergencies, call 911 or transport to nearest emergency facility
2. For non-emergency injuries, employees should be treated at:
    - o Company designated medical provider o Occupational health clinic o Urgent care facility
3. All injured employees must:
    - o Notify supervisor before seeking medical treatment (except in emergencies) o Provide medical documentation to Human Resources o Follow prescribed treatment and work restrictions o Attend follow-up appointments as scheduled

Post-Incident Drug and Alcohol Testing:

Employees involved in workplace incidents that result in injury or property damage may be subject to post-incident drug and alcohol testing according to company policy and applicable laws.

5.2 Investigation Process

Thorough investigation of all accidents, incidents, and near misses is essential to identify root causes and prevent recurrence. Streamform Contractors has established a systematic process for conducting effective incident investigations.

Investigation Team:

The investigation team will be assembled based on the severity and nature of the incident:

1. Minor Incidents:
    - o Supervisor o Affected employee(s) o Safety representative
2. Serious Incidents:

Safety Director

Site Superintendent

Project Manager

Supervisor

Employee representatives o Subject matter experts as needed

3. Major Incidents:

   o Executive management o Safety Director o Project Manager o Site Superintendent o Subject matter experts o Legal counsel (if appropriate) o External investigators (if appropriate)

Investigation Timeline:

1. Initial response and scene security: Immediately
2. Preliminary investigation: Within 24 hours
3. Detailed investigation: Within 72 hours
4. Final report: Within 7 days
5. Corrective action implementation: As specified in the report Investigation Steps:

1. Secure the Scene: o Ensure injured persons receive medical attention o Prevent further injuries or damage o Preserve evidence o Document the scene with photos and sketches o Identify potential witnesses

2. Collect Information:

   o Interview witnesses and involved employees o Review relevant documents (JHAs, procedures, training records) o Examine equipment, materials, and environmental conditions o Collect physical evidence o Review similar previous incidents

3. Analyze Information: o Establish sequence of events o Identify direct causes o Determine contributing factors o Identify root causes o Evaluate existing controls

4. Develop Corrective Actions:

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o o

o o

o Address immediate hazards o Develop long-term preventive measures o Apply hierarchy of controls o Assign responsibilities and deadlines o Allocate necessary resources

5. Document Findings:

   o Complete Investigation Report Form o Include all supporting documentation o Submit to Safety Director and management o Distribute to appropriate personnel

Investigation Tools:

1. Incident Investigation Kit containing:

   o Camera

   Measuring tape

   Evidence containers

   Interview forms

   Sketching materials

   Personal protective equipment

2. Investigation forms and checklists
3. Root cause analysis tools
4. Reference materials (regulations, procedures, standards)

5.3 Root Cause Analysis

Root Cause Analysis (RCA) is a systematic process used to identify the underlying causes of incidents, rather than just addressing immediate symptoms. Streamform Contractors uses RCA to develop effective corrective actions that prevent recurrence of similar incidents.

Root Cause Analysis Methods:

Streamform Contractors uses several methods for conducting root cause analysis, depending on the complexity of the incident:

1. 5-Why Analysis:
    - o Simple method for less complex incidents o Repeatedly ask "why" to drill down to root causes o Continue until reaching systemic causes that can be addressed
2. Fishbone Diagram (Ishikawa): o Visual tool to categorize potential causes o Categories typically include:
    - People
    - Procedures
    - Equipment
    - Materials
    - Environment
    - Management
3. Fault Tree Analysis:
    - o Used for complex incidents o Graphical representation of event sequences o Identifies multiple contributing factors o Shows relationships between causes
4. SCAT (Systematic Cause Analysis Technique):
    - o Structured approach using pre-defined categories o Identifies immediate causes, basic causes, and system deficiencies o Links to specific corrective actions

Root Cause Categories:

When conducting RCA, investigators should consider the following categories of root causes:

1. Human Factors:

- o
- o o
- o o
- o Knowledge or skill deficiencies o Physical or mental capability o Motivation or attitude o Fatigue or stress o Communication issues

2. Procedural Factors:
   - o Inadequate procedures o Procedures not followed o Procedures not enforced o Conflicting requirements o Lack of procedures
3. Equipment Factors:
   - Design flaws
   - Inadequate maintenance
   - Improper selection
   - Wear and deterioration
   - Misuse or abuse
4. Environmental Factors:
   - o Weather conditions o Noise, lighting, temperature o Workspace layout o Housekeeping issues o Hazardous conditions
5. Organizational Factors:
   - o Inadequate supervision o Inadequate training o Inadequate resources o Production pressure o Safety culture issues o Management systems

RCA Process:

1. Define the Problem:
   - o What happened?
   - o When and where did it happen?

- What was the impact?

2. Collect Data:
    - Gather facts about the incident o Interview witnesses and participants o Review documentation and records
    - Examine physical evidence
3. Identify Causal Factors:
    - Determine direct causes o Identify contributing factors o Map relationships between factors
4. Identify Root Causes:
    - Apply RCA methods to drill down to underlying causes o Focus on system and process issues o Identify multiple root causes when present
5. Develop Corrective Actions: o Address each identified root cause o Apply hierarchy of controls o Ensure actions will prevent recurrence o Consider broader applications across the organization

5.4 Corrective Action Implementation

Effective implementation of corrective actions is critical to prevent recurrence of incidents and improve overall safety performance. Streamform Contractors has established a systematic process for developing, implementing, and tracking corrective actions.

Corrective Action Development:

When developing corrective actions, the following principles should be applied:

1. Hierarchy of Controls:
    - Elimination: Remove the hazard o Substitution: Replace with less hazardous alternative o Engineering Controls: Redesign, guards, ventilation o Administrative Controls: Procedures, training, scheduling o Personal Protective Equipment: Last line of defense

2. SMART Criteria:
    - Specific: Clearly defined actions o Measurable: Verifiable completion o Achievable: Realistic and feasible o Relevant: Addresses root causes o Time-bound: Clear deadlines
3. Multiple Levels:
    - Immediate actions to address urgent hazards o Short-term actions to prevent similar incidents o Long-term actions to address systemic issues

Corrective Action Plan:

For each incident, a Corrective Action Plan will be developed that includes:

1. Description of each corrective action
2. Relationship to identified root causes
3. Person responsible for implementation
4. Resources required
5. Target completion date
6. Method for verifying effectiveness
7. Follow-up review date Implementation Process:

1. Approval:
    - Review by Safety Director o Approval by appropriate management level o Allocation of necessary resources
2. Communication:
    - Notify affected employees
    - Distribute to supervisors and managers o Include in safety meetings and toolbox talks o Update relevant procedures and documents
3. Implementation:

- Assign specific tasks and responsibilities o Provide necessary training o Acquire equipment or materials o Make physical changes as required o Update procedures and documentation

4. Verification:
    - Inspect completed actions o Test effectiveness o Obtain feedback from employees o Document verification results

Tracking and Follow-up:

1. Tracking System:
    - Centralized database of all corrective actions o Regular status updates o Automatic reminders for approaching deadlines o Escalation process for overdue items
2. Progress Reporting:
    - Weekly status reports to management o Monthly summary to Safety Committee o Quarterly review of open actions o Documentation of completed actions
3. Effectiveness Evaluation:
    - Follow-up inspections o Employee feedback o Performance metrics o Incident trend analysis
4. Lessons Learned:
    - Share successful corrective actions o Apply relevant actions to similar operations o Incorporate into training and procedures o Update hazard assessments and JHAs

5.5 OSHA Recordkeeping Requirements

Streamform Contractors complies with all OSHA recordkeeping requirements to document work-related injuries and illnesses. Proper recordkeeping helps identify trends, evaluate the effectiveness of safety measures, and demonstrate compliance with regulatory requirements.

Recordable Injuries and Illnesses:

An injury or illness is considered recordable if it results in any of the following:

1. Death
2. Days away from work
3. Restricted work or transfer to another job
4. Medical treatment beyond first aid
5. Loss of consciousness
6. Significant injury or illness diagnosed by a physician or other licensed health care professional
7. Any needle stick injury or cut from a sharp object contaminated with another person's blood or potentially infectious material
8. Any case requiring an employee to be medically removed under the requirements of an OSHA health standard
9. Tuberculosis infection as evidenced by a positive skin test or diagnosis by a physician after exposure to a known case of active tuberculosis

Required Forms:

1. OSHA Form 300 (Log of Work-Related Injuries and Illnesses): o Record each recordable injury or illness o Enter within 7 calendar days of receiving information o Maintain current log for each establishment
2. OSHA Form 300A (Summary of Work-Related Injuries and Illnesses):

   o Annual summary of Form 300 data o Certified by company executive o Posted from February 1 to April 30 each year o Submitted electronically to OSHA if required
3. OSHA Form 301 (Injury and Illness Incident Report): o Detailed information about each recordable case o Completed within 7 calendar days of receiving information o Maintained with Form 300

Recordkeeping Procedures:

1. Determination of Recordability:

- o Safety Director reviews all reported injuries and illnesses o Consults OSHA recordkeeping criteria o Documents decision and rationale o Seeks clarification from OSHA when necessary

2. Record Maintenance:

   - o Forms maintained at company headquarters o Copies available at each establishment o Records kept for minimum of 5 years o Privacy case provisions applied as appropriate

3. Employee Access:

   - o Employees have right to view current and stored OSHA 300 Logs o Access provided by end of next business day o Copies of 301 forms provided to employees involved in incidents o Employee representatives may access redacted records

4. Electronic Submission:

   - o Form 300A submitted electronically if required based on company size o Submission by March 2 each year o Verification of submission maintained with records

Reporting to OSHA:

In addition to recordkeeping, Streamform Contractors reports the following events directly to OSHA:

1. All work-related fatalities within 8 hours
2. All work-related inpatient hospitalizations within 24 hours
3. All work-related amputations within 24 hours
4. All work-related losses of an eye within 24 hours Reports are made by:

1. Calling the nearest OSHA office
2. Calling the OSHA 24-hour hotline at 1-800-321-OSHA (6742)
3. Reporting online at www.osha.gov

6. EMERGENCY RESPONSE PLANNING

6.1 Emergency Action Plan

Streamform Contractors has developed and implemented an Emergency Action Plan (EAP) to ensure prompt and effective response to workplace emergencies. This plan outlines procedures for various emergency situations and defines roles and responsibilities for emergency response.

Plan Development:

The Emergency Action Plan is:

1. Developed by the Safety Director with input from management and employees
2. Site-specific for each project location
3. Updated when conditions or personnel change
4. Reviewed annually at minimum
5. Communicated to all employees and subcontractors Emergency Situations Covered:

The EAP addresses response procedures for:

1. Medical emergencies and injuries
2. Fires and explosions
3. Severe weather (tornados, hurricanes, flooding)
4. Chemical spills and hazardous material releases
5. Structural collapse or equipment failures
6. Utility emergencies (gas leaks, power outages)
7. Workplace violence or security threats
8. Natural disasters specific to the region Emergency Response Team:

Each project site will have a designated Emergency Response Team (ERT) consisting of:

1. Site Superintendent (Emergency Coordinator)
2. Project Manager (Alternate Coordinator)
3. First Aid/CPR trained personnel (minimum of two per shift)
4. Evacuation Wardens (one per work area)

5. Equipment Operators (for emergency shutdown) Emergency Contact Information:

The following emergency contact information will be posted at prominent locations throughout the job site:

1. Emergency services (911)
2. Local police department
3. Local fire department
4. Nearest hospital and urgent care facility
5. Poison control center
6. Utility companies
7. Company emergency contacts
8. Project-specific contacts

Documentation and Training:

1. Written EAP maintained at each job site
2. All employees trained on EAP during site orientation
3. ERT members receive specialized training
4. Emergency drills conducted quarterly
5. Plan effectiveness evaluated after drills and actual emergencies

6.2 Evacuation Procedures

Streamform Contractors has established evacuation procedures to ensure the safe and orderly evacuation of all personnel in the event of an emergency. These procedures are a critical component of our Emergency Action Plan.

Evacuation Triggers:

Evacuation will be initiated in the following situations:

1. Fire or explosion
2. Structural collapse or imminent danger of collapse
3. Hazardous material release or chemical spill
4. Severe weather warning (when shelter-in-place is not appropriate)

5. Gas leak or other utility emergency
6. Security threat or workplace violence
7. Any situation deemed unsafe by the Emergency Coordinator

Evacuation Notification:

Employees will be notified of the need to evacuate by:

1. Alarm system (if available)
2. Air horn (three long blasts)
3. Radio announcement
4. Verbal notification by supervisors or Evacuation Wardens
5. Text message alert system (if implemented) Evacuation Routes and Assembly Areas:

1. Primary and alternate evacuation routes will be:
    - Identified during site planning o Clearly marked on site maps o Posted throughout the job site o Kept clear of obstructions at all times
2. Assembly areas will be:
    - Located at safe distance from the job site o Clearly identified and communicated o Large enough to accommodate all personnel o Accessible in all weather conditions o Different for various emergency scenarios when necessary

Evacuation Procedures:

During an evacuation, all personnel will:

1. Stop work immediately
2. Shut down equipment if safe to do so
3. Proceed calmly to the nearest exit
4. Assist others who need help evacuating
5. Report to the designated assembly area
6. Check in with their supervisor or Evacuation Warden
7. Remain at the assembly area until instructed otherwise Evacuation Warden Responsibilities:

Evacuation Wardens will:

1. Direct personnel to the nearest exit
2. Check assigned areas to ensure complete evacuation
3. Assist individuals with disabilities or injuries
4. Account for all personnel at the assembly area
5. Report missing persons to the Emergency Coordinator
6. Relay information and instructions to assembled personnel Accounting for Personnel:

1. Supervisors will account for their crew members at the assembly area
2. Evacuation Wardens will account for visitors and subcontractors
3. The Emergency Coordinator will compile a complete accounting of all personnel
4. Missing persons will be reported to emergency responders immediately
5. No one will return to the evacuated area until authorized by the Emergency Coordinator or emergency responders

6.3 First Aid and Medical Services

Streamform Contractors is committed to providing prompt and effective first aid and medical services for workplace injuries and illnesses. Our first aid program ensures that appropriate medical attention is available when needed.

First Aid Supplies and Equipment:

1. First Aid Kits:

    o Located in easily accessible areas throughout the job site o Clearly marked with appropriate signage o Stocked according to ANSI Z308.1 requirements o Appropriate for the size of the workforce and potential hazards o Inspected weekly and restocked as needed

2. Automated External Defibrillators (AEDs): o Available at all job sites with 25 or more workers o Located in central, accessible locations o Maintained according to manufacturer's recommendations o Monthly inspections documented

3. Emergency Equipment:

    - Emergency eyewash stations where chemical hazards exist o Emergency showers where required by hazard assessment o Burn kits in areas with thermal hazards o Specialized equipment based on site-specific hazards

First Aid Personnel:

1. Training Requirements:

    - Minimum of two employees per shift trained in first aid and CPR o Training provided by nationally recognized organization (American Red Cross, American Heart Association, etc.) o Certification maintained current at all times o Additional training for site-specific hazards as needed

2. First Aid Team:

    - Designated first aid responders identified on site safety board o Easily identifiable (hard hat stickers, vests, etc.) o Equipped with portable first aid kits when working in remote areas o Regular refresher training and drills

Medical Emergency Response:

1. Minor Injuries:

    - First aid provided by trained personnel
    - Injury documented on first aid log o Follow-up assessment to determine if additional medical attention is needed o Supervisor notification

2. Serious Injuries:

    - Call 911 immediately o Provide first aid until emergency responders arrive o Designate someone to meet and direct emergency responders o Notify Safety Director and management o Secure the scene for investigation

Medical Services:

1. Designated Medical Providers:
    - Occupational health clinic for non-emergency care o Nearest hospital emergency department for serious injuries o Contact information posted at first aid stations and site safety board o Maps and directions available
2. Transportation:
    - Emergency transportation provided by ambulance service o Non-emergency transportation arranged by supervisor o No injured employee should drive themselves for medical treatment o Designated drivers identified for each shift

Documentation and Reporting:

1. All first aid treatments documented in first aid log
2. Injuries requiring medical treatment reported according to incident reporting procedures
3. OSHA recordable injuries recorded on OSHA 300 Log
4. First aid supplies inventory and inspection records maintained
5. First aid responder training records kept current

6.4 Fire Prevention and Protection

Streamform Contractors has implemented a comprehensive Fire Prevention and Protection Program to minimize the risk of fire on our job sites and ensure appropriate response in the event of a fire emergency.

Fire Prevention Measures:

1. Housekeeping:
    - Regular removal of combustible waste materials o Proper storage of flammable and combustible materials o Clear access to exits, fire extinguishers, and fire alarm pull stations o Designated smoking areas away from combustible materials
2. Flammable and Combustible Materials:
    - Stored in approved containers and cabinets o Quantities limited to daily use amounts when possible o Proper labeling of all

containers o Separation from ignition sources o Proper grounding and bonding during transfer operations

3. Hot Work:
    - o Permit system for all hot work (welding, cutting, grinding, etc.) o Fire watch during and after hot work operations o Removal or protection of combustible materials o Availability of fire extinguishers o Inspection before, during, and after hot work
4. Electrical Fire Safety:
    - o Regular inspection of electrical equipment and cords o Proper use of extension cords and power strips o No overloading of circuits o Immediate repair or removal of damaged electrical equipment o Use of GFCI protection

Fire Protection Equipment:

1. Fire Extinguishers:
    - o Appropriate type and size for potential fire hazards o Located throughout the job site according to OSHA requirements o Clearly marked and accessible o Monthly visual inspections documented o Annual maintenance by certified technician o Maximum travel distance of 100 feet from any point
2. Fire Alarm Systems:
    - o Installed in temporary offices and enclosed structures o Tested regularly according to manufacturer's recommendations o Connected to monitoring service when available o Backup power supply provided
3. Fire Suppression Systems:

- Installed as required by building codes and regulations o Protected during construction activities o Inspected and tested according to applicable standards o Impairment procedures followed when systems are out of service

Fire Emergency Response:

1. Fire Discovery:
   - Activate nearest fire alarm or alert others o Call 911 or emergency number o Attempt to extinguish only if:
     - Fire is small and contained
     - Appropriate extinguisher is available
     - You are trained to use it
     - You have a clear escape route
     - You can fight the fire with your back to an exit
2. Evacuation:
   - Follow established evacuation procedures o Close doors when leaving to contain fire o Use stairs, not elevators o Report to designated assembly area o Account for all personnel
3. Fire Department Liaison: o Designated person to meet fire department o Provide information about:
   - Location and extent of fire
   - Hazardous materials present
   - Missing persons
   - Building layout and access point.