

## Protective Stadium Strategic Partnership Between

## Occupational Safety and Health Administration Birmingham, Alabama Area Office,

University of Alabama SafeState On-site Consultation Program,

and

Brasfield & Gorrie, LLC.

### I. PURPOSE/SCOPE

This Partnership was developed jointly by the Occupational Safety and Health Administration (OSHA), the University of Alabama - SafeState On-site Consultation Program (UA SafeState) and Brasfield & Gorrie, LLC (Brasfield & Gorrie). The common objective and goals of the Partnership include the following:

- **A.** Reduced injuries and illnesses;
- **B.** Increased safety and health training; and
- **C.** Increased numbers employers with safety and health management systems.

This Partnership is consistent with OSHA's long-range efforts to develop a contractor/government Partnership approach to safety management. It allows for better use of OSHA resources and innovation in safety management. It will also encourage more participation in the safety process from the construction industry.

To facilitate the goal of reducing occupational-related fatalities and serious injuries within the construction industry, OSHA, SafeState and Brasfield & Gorrie will implement a Partnership under the OSHA Strategic Partnership Program (OSPP). This Partnership covers the Protective Stadium Project in Birmingham, Alabama. The project consists of a new 45,000-seat, open-air stadium adjacent to the Birmingham-Jefferson Convention Complex (BJCC) and Uptown district. The stadium is a continuation of the Uptown district, which consists of retail space and the Westin Hotel at the BJCC, which was completed by Brasfield & Gorrie in 2012. The new stadium will serve as the home of UAB Football, as well as a venue for the following events: 2021 World Games; annual Birmingham Bowl; Magic City Classic; and other events. The project's completion is scheduled for December 2021.

By combining their efforts, skills, knowledge and resources, OSHA, Brasfield & Gorrie and UA SafeState expect to reduce exposure to hazards and thereby decrease the possibility of serious injuries and fatalities at the Protective Stadium Project.

### II. IDENTIFICATION OF PARTNERS

The Partnership participants will include:

- Occupational Safety and Health Administration;
- University of Alabama SafeState On-site Consultation Program; and
- Brasfield & Gorrie, LLC.

### III. GOALS/STRATEGIES/PERFORMANCE MEASURES

The primary objective of this Partnership is to create a working relationship that focuses on preventing work-related fatalities, controlling or eliminating serious workplace hazards, and establishing a foundation for the development of an effective safety and health program. The goals employed to achieve these results will include the following:

GOALS	STRATEGIES	MEASURES			
Maintain an OSHA	a) Review the OSHA 300 Log	a) This goal will be			
recordable injury frequency	data of the Partnership	measured by the number of			
at or below the national	participants and their	companies participating in			
average for the applicable	contractors, excluding OSHA.	the Partnership, which			
SIC/NAICS code.		reduce their TCIR and			
	b) Calculate Total Case	DART rates below the			
Provide a safe and healthy	Incident Rate (TCIR) and Days	baseline for the			
work environment for	Away From Work, Restricted,	Partnership.			
construction industry	Or Job Transferred (DART) <sup>1</sup>				
workers employed at this	rates.	b) The baseline rate will be			
project.		based on the 2018 BLS			
	c) Compare this data with the	rates for Non-Residential			
	baseline rates for the	Construction, NAICS 2362, which are 2.5 and 1.4.			
Effectively control	Partnership.				
Effectively control	Methods to evaluate the participants' performance in this	Compare the number of participants that develop			
workplace hazards by increasing the number of	area will include the	and implement effective			
construction companies	implementation of	SHMS as a result of			
with safety and health	comprehensive safety and	participating in the			
management systems	health management systems	Partnership, to the baseline			
(SHMS).	and an increase in the number	for the Partnership.			
	of employers that establish				
	effective safety and health	The baseline will be			
	management systems.	established during the initial			
		year of the Partnership.			

Increase the number of	Evaluate employers that provide	Provide or assist in
employees that are	employees with OSHA 10-hour/	providing necessary
provided effective safety and health training, such	OSHA 30-hour training and appropriate Competent Person	training.
as the OSHA 10-hour course and relevant Competent Person and user level training.	and user training and establish baseline.	Compare the number of employees provided safety and health training, as a result of participating in the Partnership, to the number
		of employees provided training during the baseline
		(initial) year of the
		Partnership.

Days Away from work, Restricted, or job Transferred (DART) rate: This includes cases involving days away from work, restricted work activity, and transfers to another job. It is calculated based on  $(N / EH) \times (200,000)$  where N is the number of cases involving days away, and/or restricted work activity, and/or job transfer; EH is the total number of hours worked by all employees during the calendar year; and 200,000 is the base number of hours worked for 100 full-time equivalent employees. For example: Employees of an establishment including management, temporary, and leased workers worked 645,089 hours at this worksite. There were 22 injury and illness cases involving days away and/or restricted work activity and/or job transfer from the OSHA 300 Log (total of column H plus column I). The DART rate would be (22 / 645,089) x (200,000) = 6.8.

### IV. MANAGEMENT AND OPERATION

### A. Brasfield & Gorrie:

- 1. Establish a jobsite safety team, consisting of a representative of all primary contractors on site, in order to develop an understanding and awareness that all accidents are preventable and unnecessary, and a comprehensive safety and health management system, which includes:
  - a. Management commitment and employee involvement;
  - b. Hazard analysis;
  - c. Hazard control; and
  - d. Arrangement of training assistance for other stakeholders on site.
- 2. Mentor subcontractors in safety and health management systems. The term "subcontractors" shall include all multi-tiered subcontractors that arrive for work on the site.
- 3. Where the potential for airborne silica exposure exists, require the use of wet-cutting, or soft-cutting techniques and/or a dust collection system in compliance with Table 1 of 29 CFR Part 1926.1153 and, when employee exposure levels require,

mandatory use of approved respiratory protection. Where the potential for air borne silica exposure exists, personal air monitoring will be conducted to assess employee exposure levels. Where the potential for other health issues exist (i.e., carbon monoxide, lead, or large-scale use of chemicals in the building interior during floor finishing), Brasfield & Gorrie will coordinate with the subcontractor responsible for creating the hazard and ensure that air monitoring is accomplished to assess employee exposure levels. Brasfield & Gorrie will compile and track sampling results.

- 4. Enforce safety rules and regulations. This role includes holding contractors, subcontractors, and employees accountable for following safety rules and regulations and the ability to remove a contractor's employees and supervisors from the job site, if necessary.
- 5. Ensure that a competent person performs a risk assessment of all fall hazards. The probability and severity of occurrence for each identified hazard will be evaluated to eliminate or reduce risks through engineering or administrative controls to a level as low as possible. Regarding full hazard risk assessments:
  - a. Critical risks will not be tolerated. A critical risk is defined by work that contains high probability in occurrence and high severity in consequence. No work will be performed until action is taken to reduce the level of risk to as low as reasonably feasible.
  - b. All personnel exposed to a fall greater than 6 feet shall conform to Brasfield & Gorrie's 100 percent tie-off for all employees with fall exposure at heights at six feet or greater (see Site-Specific Safety and Health Plan (SSSP).
- 6. To the extent feasible, serious ergonomic hazards will be identified and corrected.
- 7. Ensure that ground fault circuit interrupters (GFCI) are used to protect all electrical circuits that are used for work. All contractors will ensure that employees are protected by the use of a GFCI at all times.
- 8. Brasfield & Gorrie's Superintendent and on-site Safety Manager will serve as a point of contact, monitor safety and health at the site and its progress toward achievement of the Partnership goals.
- 9. Brasfield & Gorrie's Superintendent and on-site Safety Manager will

ensure that daily safety audits are conducted. Brasfield & Gorrie will review subcontractors' daily logbooks, note any hazards found, and then review them at the weekly coordination/subcontractor meeting.

- 10. Conduct and document job site safety meetings/toolbox talks with subcontractors and their employees on a weekly basis.
- 11. The Brasfield & Gorrie's Superintendent and Project Manager will lead, coordinate and conduct a comprehensive site audit on a weekly basis. Safety Committee and subcontractor representatives will participate in the site safety audit. If non-compliant activity or hazards are discovered, immediate correction is required. Brasfield & Gorrie will document the corrective action taken and share this information with OSHA during the monthly update meetings.
- 12. Audit the Partnership and make recommendations for improvement.
- 13. Share the results of jobsite inspections and information concerning near misses with all workers. Near misses and daily safety audits will be discussed during toolbox talks.
- 14. Ensure that no employees are allowed to work directly below a suspended load except for situations where no other safe alternative may exist. In these rare cases, the following criteria must be met:
  - a. Materials being hoisted shall be rigged to prevent unintentional displacement.
  - b. Hooks with self-closing safety latches or their equivalent shall be used to prevent components from slipping out of the hook.
  - c. A qualified rigger shall rig all loads.
  - d. Appropriate use of tag lines will be utilized to minimize work below suspended loads.
- 15. Require the use of appropriate personal protective equipment. Hard hats are mandatory. Employees on-site shall wear highvisibility reflective clothing. A 100 percent eye protection program will be implemented. Gloves must be worn when hand injuries are likely to occur.
- 16. Ensure that all signs and warnings are posted in English and Spanish, as well as any other languages spoken frequently by workers on-site.

- 17. Implement an effective Heat Illness Prevention Program (Heat Program) to educate workers about the hazards of working outdoors in the heat and steps needed to prevent heat-related illnesses.
- 18. Provide all data to OSHA that is needed for the annual OSHA Strategic Partnership Program (OSPP) report.

#### B. Subcontractors:

- Appoint a representative to the site Safety Committee who will be responsible for resolving job safety matters and serving as a liaison to Brasfield & Gorrie's Superintendent. Every subcontractor will have a person available to participate in the Safety Committee. Participation in this committee will consist of, but will not be limited to, participation in the Project Team Safety walkthroughs and monthly safety update meetings.
- 2. Participate in the monthly Safety Committee/subcontractor meeting and safety audits. If non-compliant activity or hazards are discovered, immediate correction is required. Abatement methods and verification must be submitted to Brasfield & Gorrie's on-site Safety Manager, who will document the correction taken and share this information during the monthly update meetings.
- 3. Conduct jobsite safety inspections for employees under their supervision. These jobsite safety inspections will be in addition to the general inspections that are to occur daily. If non-compliant activity or hazards are discovered, immediate correction is required. Documentation of abatement methods and verification must be submitted to Brasfield & Gorrie's on-site Safety Manager.
- 4. Share the results of jobsite inspections with all workers by posting them in the project office and notifying all workers of the location of the results.

### C. OSHA:

1. Participate, to the extent resources permit, in the monthly Partnership Committee/subcontractor meetings, but will not participate in the walk around inspection, except that the verification visits (see Section VIII. OSHA Verification below) may be scheduled as part of the weekly walk around inspection.

- 2. Serve as a resource and liaison for Partnership participants and also assist with safety and health training, as resources permit.
- 3. Give priority to the construction project, as resources permit, when technical assistance is needed.
- 4. Audit the monthly reports/documents and make recommendations for improvements in meeting Partnership goals.
- 5. Conduct inspections in accordance with section VIII of this Partnership.
- 6. Conduct the annual Partnership evaluation report in accordance with section VI of this Partnership.

#### D. UA SafeState will:

- 1. Give priority consideration to requests for services to small contractors who are engaged in work at the project.
- 2. Appoint a representative to the Safety Committee and participate in meetings to the extent resources allow.
- 3. To the extent feasible, conduct quarterly safety and health surveys of the project, which may include performing personal air monitoring to assess employee exposure levels to chemicals (such as silica, carbon monoxide, heavy metals, isocyanates, hexavalent chromium and other noted chemical hazards).
- 4. To the extent feasible, conduct personal noise monitoring to assess employee exposure.
- 5. Support, perform and monitor activities related to safety focus areas not limited to falls, confined space, trenching, excavations and hazardous noise.

#### V. SAFETY AND HEALTH MANAGEMENT SYSTEM

Brasfield & Gorrie will use its system to collect and analyze injury and illness trends (including near-miss incidents) by all contractors performing work at the site. This data will be used as a tool to ensure continual safety and health improvement at the site. Brasfield & Gorrie will manage this Partnership effectively by implementing a comprehensive jobsite safety and health management system, which will include the following components:

1. Brasfield & Gorrie will complete a risk assessment prior to exposing

employees (including contractors' employees) to potential safety and health hazards. This will be accomplished by the use of a Crew Work Plan - Risk Assessment (CWP) form (see Appendix 1 for Crew Work Plan).

- 2. Work with OSHA and Safety Committee members to provide the resources to conduct initial monitoring for toxins, which are anticipated to be present during construction of this project (silica, etc.). Employee exposures during activities, which may produce these hazards, will be assumed and respiratory protection worn until the results of the initial monitoring studies are received and demonstrate no exposure problems or site-based prior surveys show no hazard exists. Brasfield & Gorrie will endeavor to ensure that no work with toxins or materials prone to create respiratory hazards will occur, thus preventing any exposure.
- 3. All contractors on-site will perform daily audits. In addition, on a weekly basis, a comprehensive audit of the jobsite will be performed, with the participation of a representative of each contractor currently working on-site. Any hazards found during the audits will be corrected promptly. Items noted on the audit will be annotated on a daily log. When hazards cannot be corrected immediately, they will be tracked until abatement is completed. Employees exposed to these hazardous conditions will be informed of the hazard and effective interim control measures will be implemented. A record will be kept of all hazards found during the weekly audits and the number of hazards corrected as a result of the weekly audits.
- 4. Implement an aggressive Fall Protection Plan to include fall protection in all cases where work is being performed 6 feet or more above lower surfaces.
- 5. Ensure employees receive training as follows:
  - a. Brasfield & Gorrie workers will have received OSHA 10-hour training and possess an OSHA 10-hour card, and all Brasfield & Gorrie supervisors will have received OSHA 30-hour training and possess an OSHA 30-hour card. Brasfield & Gorrie will work with all subcontractors to provide or assist in providing their safety designee with OSHA 10-hour training.
  - b. All employees will receive a site-specific construction safety orientation covering jobsite safety and health issues, procedures relative to the work being performed, as well as the requirements outlined in the Partnership. In addition, employees

shall receive training on the content of the Site-Specific Safety Action Plan for operations they will encounter. This may require periodic retraining of employees on the content of the Site-Specific Safety Action Plan (SSSAP) as specific parts of the Plan become relevant at new phases of construction. Brasfield & Gorrie will provide this material to the subcontractors' designated safety representatives for completion (see Appendix 2 for SSSAP).

- c. Safety and health training, including the OSHA 10- and 30-hour courses, will be provided to all workers in a language they understand. Either effective translators or bi-lingual instructors will be utilized to perform this training.
- d. Additional hazard-specific training will be conducted on an asneeded basis.
- e. Subcontractors utilizing other instructors for competent person, OSHA 10/30-hour, and equipment training must provide a valid certification card showing completion of the course. Subcontractors have primary responsibility for providing the safety and health training.
- 7. Subcontractors will be required to develop an adequate safety and health management system and must submit them to Brasfield & Gorrie for evaluation.
- 8. Ensure Brasfield & Gorrie and/or the affected subcontractors adequately address health-related issues, which occur during the course of the project, with the assistance of OSHA as its resources permit. All health-related issues will be discussed monthly during the Partnership update meetings.
  - a. An effective hearing conservation program, including noise monitoring and implementation of engineering controls, where possible, will be implemented by Brasfield & Gorrie's Safety Department.
  - b. An effective environmental monitoring program will be implemented to control airborne hazards, such as silica, and will include personal monitoring, employee training, implementation of engineering controls where possible, and the use of respiratory protection when necessary. Previous site-based data will be considered acceptable.
- 9. Ensure compliance with the NFPA 70E when working on live electrical equipment, including training and the availability and use

of personal protective equipment. A permit system will be implemented whenever work around live electrical systems will be done to ensure the implementation of appropriate protective measures prior to exposure. The permit form includes requirements for pre-task review and lock out/tag out procedures to be followed.

9. Ensure all equipment is adequately guarded.

### VI. ANNUAL EVALUATION

The Partnership will be evaluated on an annual basis through the use of the Strategic Partnership Annual Evaluation Format as specified in Appendix C of OSHA Instruction CSP 03-02-002, OSHA Strategic Partnership Program for Worker Safety and Health.

Brasfield & Gorrie will be responsible for gathering required participant data to evaluate and track the overall results and success of the Partnership. This data will be shared with OSHA. OSHA will be responsible for writing and submitting the annual evaluation.

#### VII. INCENTIVES

Participant incentives from OSHA may include:

- 1. Maximum penalty reductions for good faith and history, to the extent allowed by the OSHA Field Operations Manual (FOM), OSHA Instruction CPL 02-00-160 (August 2, 2016).
- 3. In the event that a citation with penalties is issued, the Area Director has the authority to negotiate the amount of an additional penalty reduction as part of an informal conference settlement agreement, which is consistent with OSHA's current policy regarding this matter.
- 4. Priority consultation service and assistance for small employers working on the construction site from the University of Alabama Safe State.
- 5. An OSHA focused inspection is available where the Partnership participant has an effective safety and health management system fully-compliant with 29 CFR 1926.20 and 29 CFR 1926.21 (For additional details, refer to the August 22, 1994, memo signed and issued by former Deputy Assistant Secretary for OSHA James Stanley, which was revised in September 20, 1995.)

### VIII. OSHA VERIFICATION

- 1. Verification Enforcement Inspections: OSHA will conduct the initial verification enforcement inspection no sooner than two months, but within three months after Partnership, participants formally enter into this Agreement. During this period, participants should develop and implement the safety and health management systems required under this Agreement. After this period, OSHA will conduct an annual verification enforcement inspection. Compliance Officers that are familiar with the Protective Stadium Project Strategic Partnership will do verification inspections. Employee rights under the OSH Act (the Act) will be afforded. If during the verification enforcement inspections OSHA personnel identify serious hazards, the scope of the inspection may be expanded.
- 2. Complaint/Referral Investigations: This Partnership provides for the immediate response to each allegation of a safety or health hazard brought to its attention by any person. Upon a finding that an allegation is valid, the employer shall promptly abate the hazard.
- 3. OSHA agrees that a copy of each non-formal complaint/referral related to the work site and filed with OSHA will be faxed or emailed to the Protective Stadium Project office by a representative in the OSHA Birmingham Area Office. In accordance with applicable law, the name of a complainant requesting confidentiality will not be revealed. Brasfield & Gorrie agrees to investigate these complaints, regardless of the employer involved and provide OSHA with a written response within 5 working days of receiving the non-formal complaint/referral.
- 4. Accident Investigations: Employers engaged in this Partnership recognize that OSHA fully-investigates accidents involving a fatality or serious physical harm. If during the course of the investigation OSHA determines that the incident resulted from violations of OSHA standards, the Partnership may be terminated.

### IX. WORKER INVOLVEMENT/ WORKER AND EMPLOYER RIGHTS

This Partnership does not preclude employees and/or employers from exercising any right provided under the Act, nor does it abrogate any responsibilities of the Partnership participants to comply with rules and regulations adopted pursuant to the Act.

Brasfield & Gorrie, LLC will ensure employee involvement by establishing an

employee Safety Committee that will meet on a monthly basis to share the results of jobsite inspections, information concerning accidents and near misses, suggestions for improvement and recommendations for training for the general workforce. The Partnership members' management and supervisors will also continue to discuss near misses and daily safety audits during toolbox talks.

### X. TERM OF PARTNERSHIP

It is understood that this Partnership shall be in effect until completion of construction activities at the Protective Stadium site, but in no case longer than three years from the date the Partnership is signed. If any signatory of this Partnership wishes to terminate their participation prior to the established termination date, a written notice of the intent to withdraw must be provided to all other party(s), which provides a 30-day notice.

If OSHA chooses to withdraw its participation in the Partnership, the entire Partnership is terminated. Any party may also propose modification or amendment of the Agreement. Changes may be implemented, if all parties are in agreement that the changes are in the best interest of the Partnership.

### XI. PROTECTIVE STADUIM STRATEGIC PARTNERSHIP

Partnership Signing Date: \_\_\_\_\_

Ramona Morris Area Director Occupational Safety & Health Administration (OSHA) Steve Sawyer Regional Safety Director Brasfield & Gorrie, LLC

Caleb Ward Safety Manager Brasfield & Gorrie, LLC Robby Hayes Division Manager Brasfield & Gorrie, LLC Larry Helms Senior Superintendent Brasfield & Gorrie, LLC Darrell Morris Senior Superintendent Brasfield & Gorrie, LLC

Brian Ricks Project Director Brasfield & Gorrie, LLC Matt Hollub Associate Director UA SafeState

## **APPENDIX 1**

#### **REMIND CREW:**

YOU SEE IT, YOU OWN IT, YOU SHARE IT Every crew member has an obligation to stop work if something is unsafe.

#### CREW WORK PLAN SIGN IN/SIGN OUT

**CREW SIGNATURES:** By signing below, each crew member acknowledges complete understanding of the assigned tasks, identified hazards and the appropriate elimination/mitigation actions. By initialing at the end of the day, each crew member acknowledges that they were not injured. All incidents and injuries should be reported immediately to Brasfield & Gorrie Supervision.

#### INVOLVED CREW MEMBERS

Name	Initial Out
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	
11.	
12.	
13.	
14.	

#### ANY CREW MEMBERS (LESS THAN 90 DAYS)

Names:\_\_\_\_\_ Assigned Coaches:\_\_\_\_\_

Names:\_

Assigned Coaches:

\*Hardhat Decal should be in place to identify new employees

#### **CREW LEADER POST WRAP UP**

Foreman/Crew Leader: \_\_\_\_\_

Did we meet or exceed our production goals today? Yes No

If no, what prevented us from reaching our goals?

What did we learn that we can share with the crew tomorrow?

Is the work area clean and free of debris from the day's work? Yes No

Were there any injuries, property damage, or near misses reported today? Yes No

If yes, notify your Superintendent and the safety department immediately. Who was contacted:

Description of event: \_\_\_\_\_

#### REVIEWERS

Superintendent:\_\_\_\_\_

Safety: \_\_\_\_

#### MANAGEMENT PARTICIPATION

Name:



## DAILY CREW WORK PLAN

Dates:	
Project Name:	
Client Name:	
Location:	
Foreman:	
Weather Forecast:	



#### PRODUCTION GOALS

What a	e our production goals for today?
1.	
2.	
3.	
4.	
5.	
6.	

#### SERIOUS INJURY PRECURSORS

My Highest Risk Activity Today:

Work at Height

Demolition

Excavation over 4'

Stored Energy/LOTO

\*Start with and Spend Extra Time on

any High Risk Activity Identified

Traffic Control

Manual Handling

Utilities Located/Verified

**Rigging/Lifting Operations** 

Heavy Equipment Movement

(Interaction with foot traffic)

Overhead Operations (Barricading)

**JOB/TASK STEP** 

How are we going to do the work?

Working around/near General Public

#### **CREW INVOLVEMENT QUESTIONS**

1. What has changed that will impact our work today? (weather, hazards from other trades, access/ egress, location, elevated work, additional material handling, chemicals, new crew members, lighting, public interaction, etc.)

2. What did we learn during our last shift that can help us be more productive and safe today?

#### **EMERGENCY ACTION PLAN**

Evacuation Route/Assembly Area:

Emergency Phone Number:

Location Address:

#### **POTENTIAL HAZARDS OR ERRORS**

How can injury occur? What could go wrong?

#### EMPLOYEE CERTIFICATIONS REQUIRED

(Check all that Apply)

- Competent Persons (Excavation, Confined Space, Scaffolds, Fall Protection)
- Crane Operator
- Forklift Operator
- Rigging/Signal
- Powder Actuated Tool User
  - Aerial Lift
- Scissor Lift
- Respiratory/Fit Testing
  - Traffic Control Flagger

#### PERMITS REQUIRED FOR TODAY'S WORK

- Confined Space Excavation Lockout/Tag out Critical Lift Burn/Hot Work Line Break/Hot Tapping Scaffolding ō Utility Clearances
- Lane Closure
- Other :

#### **ELIMINATION/CONTROL ACTIONS**

What are we going to do about it?

	(Include tools, equipm	
START WITH THE MOST HAZARDOUS WORK FI	<b>RST</b> Consider work that is unfamiliar to any crew member as higher risk. Extra time needs to I SE INSTRUCTIONS for any work that may be new to any crew member.	be spent providing CLEAR,
	I	
	I I	
	l l	
	i i	

## **APPENDIX 2**

### JOBSITE SPECIFIC SAFETY PLAN (JSSP)

# PROJECT:Protective Stadium ProjectLOCATION:1024 24th St North Birmingham, Alabama 35203

### PROJECT CONTACTS

Sr. Superintendent:	Larry Helms	205-965-6316 (C)
Superintendent:	Darrell Morris	205-368-9335 (C)
Division Manager:	Robbie Hayes	205-567-1458 (C)
Sr. Project Manager:	Judd Branch	205-714-1566 (O) / 256-338-1699 (C)
Sr. Project Manager:	Chad Patterson	205-714-1625 (O) / 615-456-0260 (C)
Job Site Assistant:	Renee Pearson	205-714-1347 (O) / 859-494-1561 (C)
Safety Manager:	Caleb Ward	407-725-2027 (C)
Reg. Safety Manger:	Steve Sawyer	205-714-1789 (O) / 205-903-4522 (C)

### **Project Narrative:**

The project consists of a new 45,000-seat, open-air stadium adjacent to the Birmingham-Jefferson Convention Complex (BJCC) and Uptown district. This long-awaited stadium is a continuation of the Uptown district, which consists of retail space and the Westin Hotel at the BJCC, which was completed by Brasfield & Gorrie in 2012. The new stadium will serve as the home of UAB Football, the 2021 World Games, and the annual Birmingham Bowl and Magic City Classic, among other events. The Project is expected to be a catalyst for future development in the surrounding area.

### Scope of Work:

Brasfield & Gorrie's primary work load will consist of general construction. All site employees will be required to complete daily Crew Work Plan meetings and will be supervised by a site foreman. The superintendent and safety manager will have the responsibility of enforcing safety on a daily basis. Brasfield & Gorrie will assist subcontractors with site coordination and planning.

### **Public Protection:**

During non-working hours, the jobsite's gates shall be locked. No trespassing signs shall be posted in conspicuous areas on the perimeter of the project to warn the public to stay out of the site. Manned security will be implemented during non-work hours in the evenings and weekends. All visitors will be required to sign-in at the Brasfield & Gorrie office trailer. B & G management will be responsible for making sure all visitors are accompanied on the project and are informed of site personal protective equipment requirements.

### **Orientation:**

Site-specific orientation will be held on an as needed basis. All employees who are or will be working on site must attend this training prior to beginning work on the project. This training will encompass site safety, procedures, hazard communication, emergency planning, and basic construction safety. A site-specific orientation sticker will be issued to all employees who attend this training and complete safety acknowledgment form.

### **Site Logistics:**

All haul roads will be built and maintained by site contractor. Laydown area is available to each subcontractor as needed. Work will only take place in the daytime unless light towers are installed to provide workers with adequate visibility. Wash out areas will be provided to concrete trucks and pump trucks in areas that will not affect traffic. Brasfield & Gorrie will manage trash dumpsters on the project.

### Crane Operations:

Only certified crane operators will be allowed to operate cranes on site. Only qualified riggers/flaggers will be allowed to signal the crane and rig loads to be flown. Hand signals/radios will be used to communicate with the crane operator. Whistles will be used to alert all employees in the area that a pick is being made. All loads must have a non-conductive tag line attached. For mobile cranes, the swing radius of the crane must be barricaded at all times. Outriggers must have appropriate cribbing in place prior to any loads being flown.

If a crane's working radius encompasses active power lines, one of the following must be done:

- 1. De-energize and ground the power lines (Must be done by the appropriate utility company)
- 2. Maintain a minimum 20 feet safe approach distance
- 3. Determine the voltage of the lines and follow safe approach distances Table 4.2 in SHEMS

### Personal Protective Equipment:

Hard hats, high visibility vest or shirt, long pants, work boots, and safety glasses shall be worn at all times. This practice will be enforced on a daily basis as per Brasfield & Gorrie's safety policy. Brasfield & Gorrie will monitor subcontractors PPE at all times. Failure to wear mandatory PPE will result in verbal and written warning. If problems persist, employees may be suspended or removed from the project.

### Fall Protection:

All subcontractors will be required to have fall protection when exposed to a fall of 6' or greater. Brasfield and Gorrie has a zero-tolerance policy on fall protection infractions. Any employee observed violating the fall protection policy will be suspended from the project for a time-period to be determined by the project team. Any further infractions by that employee will result in the employee's permanent removal from the project.

Each subcontractor is required to create a plan or system to address fall protection within his or her scope of work. These plans or systems are maintained in their company's site-specific safety plans. Each company's site-specific plan is kept at the B & G office trailer.

### **Guardrails and Floor Opening Protection:**

All guardrails, both wire rope and wooden, will be built to comply with Brasfield & Gorrie SHEMS manual. The top railing will be at 42" +/– 3" and able to withstand a downward and outward force of 200 lbs. All railings will include a mid-rail set at 21" +/- 3" and able to withstand a force of 150 lbs. All guardrails that are in locations with work or foot traffic under them shall have toe-boards installed to prevent materials and tools from falling. This toe-board will be maintained until glass or precast concrete is set on the exterior of the building rendering them un-needed. If wire rope is used for guardrails, the wire rope must be at a minimum 3/8" diameter and flagged every 6'. The wire rope must be kept taut so it will be able to withstand a force of 200 lbs. and not sag below 39". Three clips must be installed at attachment points with 3" spacing between them.

All floor holes that are 2" or greater will be covered with plywood and marked with hi-vis paint. Any holes over 8" will be identified with the words "Hole or Cover" and "Hoyo". In the case of depressions/recesses, the area will be flagged off to warn of the depression or the edge will be painted with hi-vis paint. All covers will be secured to prevent accidental displacement. Hole covers must be made to withstand twice the weight of worker, materials, and tools. No materials can be stored around or on top of hole covers. Covers must be kept well maintained and swept clean.

### **Roof Access:**

Only authorized personal will be allowed on the roof. Fall protection will be required around leading edges beyond warning lines. Roofers will install a warning line 6' back from the edge of the roof. This warning line is only to be used by the roofer. All other subcontractors will be required to install a warning line 15' back from the roof if desired. If work is to take place beyond the warning line, a fall restraint or fall arrest system must be utilized.

### Trenching and Utility Lines:

Brasfield & Gorrie and all subcontractors involved in trenching activities will be required to complete an excavation inspection for all excavations or trenches that are 4' or deeper. These reports will be completed daily, after rainstorms, and after an event where conditions may change the characteristics of the trench. These are to be completed by a competent person and submitted to Brasfield & Gorrie. Trenches of significant depth or trenches that are obstructed from view shall be flagged to prevent accidental injury. Trenches 4' or greater in depth will have a means of access and egress (ladder, ramp, stair, etc.). All trenches shall be guarded or sloped when at a depth of 5' or greater. In compliance with SHEMS, Brasfield & Gorrie will assume all soils are type C until a soils engineer proves otherwise. Acceptable sloping for trenches or excavations 5' in depth or greater is 1.5:1. Any excavations or trenches 20' or greater in depth must have shoring/shielding system designed by a registered professional engineer.

Brasfield & Gorrie Dig permits will be completed before any excavation takes place. This will ensure all utilities are located by a third party and adequate steps are then to protect employees during excavation process. If utilities are present in the proposed excavation, soft digging methods must be utilized. Once utilities have been uncovered, they must be braced and protected from damage.

### **Safety Meetings and Training:**

All subcontractors are required to attend the weekly project safety meeting. Brasfield & Gorrie will provide site-specific orientation to all new employees on site. Orientation and hazard awareness training will be administered on an as needed basis. PM/Superintendent safety walks will be held biweekly and a supervisory member of each subcontractor is expected to attend. All deficiencies identified will be sent to the responsible subcontractors via emails. Subcontractors are required to respond to these deficiencies in writing within 48 hours. Failure to abate deficiencies or respond in writing could delay payment.

#### **Emergency Action Plan:**

Emergency Action Plan (EAP) will be posted in common areas around the project site (Brasfield & Gorrie trailer, job boards, break areas, etc.). The plan will be included in each employee's orientation. The EAP will be reviewed periodically during site wide safety meetings and scheduling meetings. This plan is subject to change, as the site progresses, all employees will be notified and retrained if any changes are made. Please see the site specific EAP on the following pages.

KEY PERSONNEL AND CONTACT INFO           1.         Larry Helms (Sr. Supt.)         205-969-6316 (C)           2.         Judd Branch (Sr. PM)         256-338-1699 (C)           3.         Darrell Morris (Sr. Supt.)         205-368-9335 (C)           4.         Caleb Ward (Safety)         407-725-2027 (C)           ALTERNATIVES:         1.         Chad Patterson (Sr. PM)         615-456-0260 (C)           EMERGENCY NUMBERS:         1.         Birmingham Fire and Rescue         911 or 205-254-2995           2.         Birmingham Police Department 911 or 205-254-1700         911 or 205-254-1700	<ul> <li>MEDICAL EMERGENCIES AND 1<sup>ST</sup> RESPONDERS</li> <li>Notify 1<sup>st</sup> Responders (Who, What, where) – Caleb Ward (Alt: Darrell Morris)</li> <li>Retrieve First Aid Kit/AED – Vernon Moss</li> <li>Perform First Aid/CPR (if needed) – Caleb Ward</li> <li>Entrances manned to flag and guide Emergency Vehicles into site – Eric Bush</li> </ul>
<ol> <li>UAB Hospital 911 or 205-934-3411</li> <li>SHELTER IN PLACE</li> <li>LIGHTNING         <ol> <li>Monitor weather via WeatherBug, Weather Underground, etc. – Caleb Ward (Alt: Darrell Morris)</li> <li>If lightning is within 10 miles, halt all outdoor activityand notify employees to seek shelter (airhorn/text/radio) – Caleb Ward (Alt: Darrell Morris)</li> <li>Sound All Clear (Text/Radio) once lightning is more than 10 miles away – Caleb Ward (Alt: Darrell Morris)</li> </ol> </li> <li>Severe weather via sources above – Caleb Ward (Alt: Darrell Morris)</li> <li>All personnel notified of severe weather and told to proceed to shelters via text – Caleb Ward (Alt: Darrell Morris)</li> <li>Verify all employees accounted for in Shelters – Caleb Ward (Alt: Darrell Morris)</li> <li>Give the All Clear Alert (Text/Radio) – Caleb Ward (Alt: Darrell Morris)</li> </ol>	<ol> <li>All personnel notified of fire and told to evacuate to nearest Assembly Area via Text/Radio – Caleb Ward (Alt: Darrell Morris)</li> <li>Attempt to extinguish fire (if incipient) – Caleb Ward</li> <li>If fire can't be contained, notify Emergency Responders – Caleb Ward</li> <li>Entrances manned to flag Emergency Vehicles into site – Eric Bush</li> <li>1<sup>st</sup> Responders guided to staging areas/scene – Darrell Morris</li> <li>Verify all employees accounted for at Assembly Areas – Kenny Pearson</li> <li>GAS LEAK</li> <li>All personnel notified of gas leak and told to evacuate to nearest Assembly Are via Text/Radio – Caleb Ward (Alt: Darrell Morris)</li> <li>Notify Emergency Responders – Caleb Ward (Alt: Darrell Morris)</li> <li>Entrances manned to flag and guide Emergency Vehicles into Site – Eric Bush</li> <li>Verify all employees accounted for at Assembly Areas – Darrell Morris</li> <li>All personnel notified of gas leak and told to evacuate to nearest Assembly Are via Text/Radio – Caleb Ward (Alt: Darrell Morris)</li> <li>Rotify Emergency Responders – Caleb Ward (Alt: Darrell Morris)</li> <li>Entrances manned to flag and guide Emergency Vehicles into Site – Eric Bush</li> <li>Verify all employees accounted for at Assembly Areas – Darrell Morris</li> <li>All Clear (Text/Radio) – Caleb Ward</li> </ol>



## SAFETY ACTION PLAN

**Protective Stadium** 

#### **Project Team**

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TITLE	NAME	PHONE
Gen. Superintendent:	Terry Collier	(205) 504-1633
Superintendent:	Larry Helms	(205) 965-6316
Superintendent:	Darrell Morris	(205) 368-9335
Project Manager (Structure/Civil):	Judd Branch	(256) 338-1699
Project Manager (Skin/Interiors):	Neil Caudle	(205) 602-7235
Project Manager (MEP/Sports):	Chad Patterson	(615) 456-0260
Safety:	Caleb Ward	(407) 725-2027
Safety:	Vernon Moss	(205) 209-6436
Safety:	Josh McKinney	(407) 773-1068

#### **Project Logistics and Setup**

Mon to Fri: 7:00 AM to 5:30 PM Saturday: 7:00 AM to 3:30 PM

NOTE: A Brasfield & Gorrie supervisor with up to-date CPR/First Aid certification and OSHA 30-hour must be present during all work.

Noise ordinance: Notify BL Harbert Prior to Nuisance noise levels.

Orientation schedule: M-F 8:00 AM (English) 9:00 AM (Spanish). Safety Trailer Weekly Safety Meeting; Tuesday at 7:00 AM (Trailer Compound)

Describe parking area and travel to project site: Parking is available around the project along the surrounding streets. There will be no parking onsite for personal vehicles. Currently, employees are to enter through Gate 5. A man gate will be added along 22<sup>nd</sup> St North for employee access to site. EMS services, if dispatched, shall enter through Gate 5 and/or Gate 4. **Jobsite fencing:** Project will be completely fenced in by a permanent fence system per SHEMS.

Preferred clinic: Dr. Bruce Romeo, Alabama Comp								114															
Wi	ildw	ood	Pkv	vy, E	Bhar	n, A	L 35	209															
_	_	_	—	_	_	_	_	_	_	_	—	—	_	_	_	_	_	—	_	_	_	_	_

#### **Project Overview**

Description: 45,000 Seat Open Football/ Soccer/ Multiuse

Estimated B&G crew size: Approximately 140

Gate 5 for all deliveries at this time, future deliveries will have additional gates **Deliveries:** added. Gates will be updated on site-specific plan as project goes on.

#### **Housekeeping Plan**

Trash chute location: N/A

**Dumpster location:** TBD and will posted on site logistics and housekeeping plan.

Housekeeping Plan: All subcontractors as well as B&G employees will perform continuous and daily cleanup of all work areas. B&G employees will monitor and control the general areas fo cleanup and maintenance. Trash pans / hoppers will be used to haul debris to the dumpster

locations by a RTFL and the cranes onsite. This project is going to utilize the following housekeeping initiatives during construction of the tower.

No Cords on the Ground: Once work begins within the limits of the structure, all extension cords should be suspended above the work surface, preferably above 8' whenever possible. Cords should be suspended using non-metallic hangers (j-hooks, PVC hangers, etc.), to prevent potential electrical shock hazards.

No Trash Hits the Ground: It is our expectation, that as trash or debris is produced by any trade, it is immediately placed into the crew's designated container until it is removed from the work area to be placed into the jobsite dumpster or otherwise removed from the site.

Material on Wheels: ALL materials on-site shall be stored in a manner that allows them to be moved easily. This can mean that material carts with casters/wheels/etc. are utilized, materials are placed on pallets and pallet jacks are readily available, or any other manner that allows for materials to be moved from its current position in a matter of minutes.

Please see Housekeeping & Jobsite Cleanliness Strategy Plan for specific details regarding each initiative.

### **Working From Heights**

Working from heights will be one of our Critical Risk (STCKY -Stuff that can kill you) Focus areas for this project given the extensive amount of potential fall exposures. We will have a heavy emphasis on the prevention of falls as well as extensive training for employees required to wear fall protection equipment.

Fall Rescue Plan: We will have an extensive amount of Mobile Equipment Work Platforms (MEWPs) onsite, which will be our primary means for fall rescue. There will also be times where we will have to utilize ladders to rescue employees that may be suspended - Each crew will address daily in their Crew Work Plans (CWPs) both the areas where fall protection will be required as well as a plan for rescue.

#### **Training/Competent Persons Verification**

There will be a heavy emphasis placed on the quality and documentation of training for these employees – for both B&G as well as all subcontractors where applicable. These training documents will be retained onsite and these employees will be identified onsite by the use of specific hardhat decals, colored vest, etc. depending on the scope and activity. 🕼 NCCCO Crane

C Forklift 🖾 Traffic Contro



N/A 🗌

System used for self-perform concrete activities: For the leading edge work we will utilize the Secura Span Post and Ez Line System designed by Protecta / DBI Sala. The entire system will be installed in strict accordance with the engineering specifications and the Manufacturer's Recommendations. The elevated deck will be decked solid thus eliminating a lot of the fall exposure. In areas where there are open sides / edges, this system will be utilized. Employees working on the Shoring Scaffolding will utilize positioning hooks and 6' Double Lanyards to allow them 100% Fall protection at all times. Employees working on the wall forms will be secured by the use of 50' Retractable Lanyards attached at the top of the form and will attach as they prepare to climb the wall. On the concrete structure we will install a wooden 2x4 guardrail system on all open sides / edges where applicable. For the steel structure component of the stadium, we will install a Cable Guardrail System along with perimeter debris netting on all open sides / edges (see Falling Object Protection Section).

Ladders: There will be an increased awareness for employees working on Ladders for the project. Ladders will be used only when necessary and a safer way isn't feasible.

Employees required to work from ladders will be adequately trained in their safe use and inspection process. Scaffolding will also be a focus area for us on this project.

Scaffolds: There will be a trained Competent Person in place at all times employees are working from scaffolding. Those scaffolds will have daily documented inspections and will be tagged accordingly. Employees involved in the erection or dismantling process will be provided with adequate fall protection at all times.

		-
eOperators	Crane Signalman	Confined Spaces
Scissor Lift 🗾 Boom Lift	Crane Rigger	Scaffolding
ol Flagger	Excavations	Fall Protection

#### **Crane / Hoisting Operations**

#### N/A

	· · ·				
Number/type of cranes:					
Grove GHC75					
Manitowoc Model 555 (2)					
Terex SK415 (Tower Crane)					
Erection Dates:	01/20/2020, 01/27/2020, 02/2020, 03/2020				
Air space restrictions: TBD					
Safe Operating Wind Speed:	20 mph (Sustained or Gusts)				
Operator license expiration:	Dale Lowrey Jr (08/31/2021) Jim Carter (7/31/2022)				
Operator Evaluations on File:	Yes				
Underground Utilities (Also see					

### **Digging Operations Section**)

Name of private utility locate: Bhate

Type of markings to be used: Paint, Utility Marker Placards, and Whiskers

Dig board location: Safety Operations Office Trailer

**Overhead Operations** 

#### N/A 🗌

Overhead Operations is a Critical Risk (STCKY) Focus Areas for this project. The prevention of dropped object from overhead and / or elevated areas will be incorporated into all construction activities as well as all contractors that work onsite. Each daily Crew Work Plan will address the potential for this risk as well as controls that will be implemented to prevent and protect employees working below. At any point where overhead work is taking place on the edges or open sides of the structure, the area(s) / level(s) below must be barricaded (Restricted Access Zone) to prevent access and a trained designated Spotter must be in place. Tool tethers will be one control that will be implemented where practical to eliminate the risk of dropped tools from elevated areas. Also, on all open sides, edges and interior opening where conventional guardrails are installed, we will install a debris netting system that will attach to the guardrail system. This system can also replace the need for a standard toeboard in areas where it is installed as such. We will also install this system along the sides of the open ramp areas, elevator shafts, as well as the open stairwell areas.

#### **Hot Work**

N/A 🗌

Fire Prevention / Protection will be a major focus for us on this project with the amount of "Hot Work" that will take place during construction activities. We will manage this through a number of ways one in particular is through a robust Housekeeping and Material Storage Plan. By minimizing the amount of combustible material / debris in the structure will minimize the potential fire hazard. A Burn Permit will be completed prior to any hot work activities taking place onsite. A permit is required a specific area and / or task based on the need for that day. These will be signed daily by B&G Management. Anytime hot work activities are taking place, a Designated Fire Watch will be in place and will remain as long as needed post the hot work to inspect for any lingering hot material. Fire extinguishers will be readily available when hot work is taking place and placed throughout the structure for every 3000 square feet of space. These will also be located at each stairwell and major entrance to the structure. Please see the site-specific Fire Prevention and Protection Plan for further details.

#### Lock Out / Tag Out (Electrical **Safe Work Practices**)

N/A 🗌

Lock Out / Tag Out is one of our Critical Risk (STCKY) Focus areas for this project. Energized electrical work is prohibited except when absolutely necessary. When

energized electrical work is to be performed an Energized Electrical Work Permit must be completed and signed by B&G Management. Our electrical subcontractor will submit (prior to construction) an electrical safe work practices plan that correlates to the requirements set forth in our SHEMS Manual. An electrical switchover meeting will be conducted prior to the transition to permanent power to address the potential risk associated with that phase of construction.

#### **Digging Operations**

N/A 🗌

NOTE: Once excavations reach 5-foot depth, they must be sloped at a 1 ½ :1 ratio unless otherwise instructed by the Civil Engineer of record.

Digging Operations (Including underground utility strike prevention and cave-in protection) will be one of our Critical Risk (STCKY) Focus areas for this project. There will be a trained Competent Person onsite at all times excavation work is taking place. Employees required to work in excavation / trenches greater than 4' in depth will be protected by a positive means such as shoring, shielding, sloping, etc. at all times. Inspections will be conducted daily by the Competent Person and documented. Utility Strike Prevention: A Dig Board will be established onsite to allow for tracking of all known existing UG Utilities as well newly installed during construction. This board will be referenced prior to anyone digging / breaking ground onsite. This board will have asbuilts in place to identify specific utility locations to allow for coordination with current underground work to take place. Prior to digging / breaking ground a 3<sup>rd</sup> party locate will be performed to locate any unknown utilities that may exist. Also, a Dig Permit will be completed by the Supervisor for that scope of work and signed by B&G Management prior to work commencing. All utility locations will be marked by a positive means prior to these activities taking place to allow for the operator / employees to see the location of known utilities. Soft digging methods (Vacuum Trucks, Hand Digging, etc.) will be practiced when working within 18" of a known utility location. No mechanical means will be used inside this tolerance zone. In areas where high congestion is a concern such as in the roadway, perimeter of the project, etc. Vacuum Trucks will be utilized to expose the utilities in those areas since conventional methods are unreliable. The Jobsite will have Temporary Power in place to power tower cranes and Temporary jobsite power. To protect this it will be encased in Concrete, Markers in place at all times and Dig Permits for all trades digging.

#### **Confined Spaces**

N/A 🗌

There will be a limited amount of known confined spaces at this point in the project. They will be limited to manholes and elevator pits. A trained Competent Person will be in attendance anytime an employee is working in a confined space. A confined space permit will be completed by the Competent Person and submitted to B&G Management prior to entry into those spaces. Initial air monitoring will be conducted for any confined space prior to an employee entering that space for atmospheric hazards. Monitoring will be completed daily or when the environment changes. We have no reason to suspect there will be Permit Required Confined Spaces at this time. In the event that we encounter that situation, the necessary controls and plan will be implemented prior to any person entering that space.

# **Roadway Operations**

Roadway Operations will be a Critical Risk (STCKY) Focus Area for us on this project. There will be both semi-permanent road / lane closures as well as temporary lane closures for deliveries, concrete pours, etc. There will be a Traffic Control Plan established for any semi-permanent or permanent lane / road closures that must take place. These will be designed and approved by a 3<sup>rd</sup> party. All traffic control devices will be installed per MUTCD Guidelines at all times the closure is in effect. General awareness signage will be installed to notify motorist and pedestrians of the work zone and general construction activities. Employees that are needed to "Flag / Signal" traffic will be protected by a positive means such as barricades or be positioned in a way as to not be exposed to oncoming vehicular traffic. All Flaggers will have documented training of the risks associated with that work as proper flagging procedures.

### **Rigging Operations**

Rigging Operations will be a Critical Risk (STCKY) Focus Area for this project. Only documented, trained Qualified Riggers will be allowed to rig any loads onsite. These individuals will be identified onsite by a colored vest. Tag lines will be used on all loads for load stabilization as well as to protect the Rigger / Signal Person catching the load. All rigging will have documented inspections and will be inspected daily prior to each use. Adequate measures will be taken to properly store rigging equipment. Rigging will not be stored on the ground or left in the weather for extended periods of time. Rigging and Signaling employees will wear an Orange Vest/Orange shirt and receive a specific sticker to help identify in field.

a hardhat decal. required to attend.

#### N/A

NOTE: All traffic control plans must be designed by a 3<sup>rd</sup> party.

#### N/A 🗌

#### **Additional Safety Initiatives**

**Project Safety Committee:** Will be established onsite and led by the Project Safety Team. This Committee will be comprised of craft employees from various trades. This Committee will report recommendations and safety concerns to the Project Leadership Group, but Leadership will not actively sit on the Committee.

Safety Champion Recognition: The Project Team will establish creative ways to recognize safety leaders and champions onsite. We will recognize crews as well as individuals that exhibit stellar safety leadership onsite.

Safety Orientations: Site Specific Safety Orientations will be conducted daily and all employees that work onsite must attend, complete the orientation review and receive

Weekly All Hands Meeting: A weekly Safety Meeting will be held by B&G Management every Tuesday morning. All employees working onsite for that week are

Crew Work Plans: All trades / employees working onsite will conduct a daily CWP that addresses the hazards for that day specific to their work as well as the safe plan / controls that will be implemented to protect employees. These will be documented, reviewed and submitted to B&G Management.