



# Subcontractor HSEQ Orientation

Centennial Contractors Enterprises, Inc.

- **Intended Audience**
- **Jobsite Safety**
- **Competent Person(s)**
- **PPE**
- **GHS**
- **Activity Hazard Analysis**
- **Hazard Reporting**
- **Incident Reporting**
- **Substance Abuse**
- **Regulatory Inspections**
- **HSEQ Non-Conformance**
- **Resources**

This presentation is intended for the owner/s, operational managers, or anyone with signature authority within your company.

- Subcontractor Company Owners
- Subcontractor Company Employees with Signature Authority
- Subcontractor Project Managers (optional)
- Subcontractor Superintendents (optional)
- Subcontractor Foremen/Lead Person (optional)

\*All project/site personnel will attend a Site-Specific Safety Orientation on the project/site they report to.



# Mission Statement

**“Safety is the single most important thing we do. Safety is more important than profit, quality, schedule or customer satisfaction. If we cannot perform work safely, we will not do it. Safe is the only way we do business.”**



# Jobsite Safety

Your employees will attend an On-Site Safety Orientation on each project site they occupy. These orientations will provide safety information specific to the job location and they will be required to sign-in, acknowledging they have attended this training and received the information.

Each subcontractor employee will be issued a hardhat sticker that must be worn while performing work on a Centennial project.



# Jobsite Safety

Centennial's **Site Safety Rules** are a list of 21 different requirements which must be adhered to, so your workers are safe on Centennial projects.

All subcontractor employees will review this document as part of the On-Site Safety Orientation. Their signature acknowledges their receipt of these rules and requirements.

You will be given a copy of the same document as part of this Subcontractor Orientation.

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## Site Safety Rules

- 1) Each subcontractor must have a competent person onsite whenever work is being performed. Prior to starting work, the Subcontractor must provide Centennial a letter designating the competent persons for the project.
- 2) All personnel must attend a safety orientation prior to ascending a jobsite and attend weekly toolbox talks.
- 3) All incidents must be reported to the Centennial jobsite representative immediately. Post-incident Substance Abuse Tests may be conducted as determined by a Centennial Regional HRBQ Manager.
- 4) All personnel must be trained in the hazards associated with their job and such training documented.
- 5) Each subcontractor is responsible for supplying its employees with all required personal protective equipment ("PPE") appropriate for the tasks being performed. Additionally, the subcontractor must provide its own GFCIs, First-Aid Kits(s), and fire extinguisher(s) in the work area.
- 6) Everyone must wear their hard hats with the brim facing forward when on the jobsite. Unapproved headgear such as ball caps, hoodies, and wool caps may not be worn under any hard hat.
- 7) Hearing protection must be worn when sound levels exceed 85dBA.
- 8) Safety glasses meeting ANSI Z87.1 must always be worn on the project site. Prescription safety glasses must have permanently affixed side shields. Personnel performing hot work or laser assisted work must wear appropriately shaded and protective eye protection.
- 9) When respiratory protection is required, personnel must possess and present fit test and medical evaluation documentation prior to beginning any work on site.
- 10) No employee may wear torn or altered clothing, sweatpants, short pants, or shirts without sleeves.
- 11) Personnel onsite must wear hand protection with a minimum ANSI Cut Level 2 Rating unless other protection is defined within the AHA for a specific work activity.
- 12) Leather work boots must always be worn on the jobsite. Work boots must meet ASTM criteria to protect from falling objects, chemicals, punctures, and slips. Steel or composite toe work boots meeting or exceeding ASTM F2413 must be worn when required by the AHA and are recommended in all cases. No athletic shoes (without ASTM certification), canvas shoes, or leather soled shoes may be worn at the job site.
- 13) Fuel lines must be constructed of metal and incorporate a flame arrester. The contents of any fuel can must be labeled per the OSHA Hazard Communication Standard (which aligns with the GHS).
- 14) Subcontractors must provide fire extinguishers within 50 feet of all flammables. Subcontractor must ensure that the maximum travel distance to their nearest fire extinguisher does not exceed 75 feet.
- 15) Subcontractors must provide their personnel with fall protection when the work platform is six feet or greater above grade, above five feet on a federal military installation, or if a known fall hazard exists at any height.
- 16) Hand and power tools must always be in proper working condition and must have all manufacturer required safety guards and legible safety labels.
- 17) Power tools may not have damaged power cords. An approved GFCI or GFCI-protected branch circuit must be used for all power tool operations. All extension cords must be UL listed, designed for hard- or extra-hard use, and be minimum 14 gauge three wire type (with a heavier gauge for cord lengths over 50 feet). The subcontractor must protect cords against pinching and cutting.
- 18) Workers are forbidden from working on scaffolding with missing or improper planks, guard rails, cross bracing, pins, and sills, or toe boards. Workers are forbidden from working on scaffolding that does not have a ladder or other approved safe access. All scaffolds must be inspected, approved, and "TAGGED" prior to employee use by the scaffolding competent person. Mobile scaffolding must have all four wheels locked while in use and may not be pulled along by its wheels. The project superintendent must be notified of all erected scaffolding prior to its use.
- 19) Ladders must be minimum heavy-duty (Type I) or greater. Ladders must be secured from displacement at the top and bottom and employees must face the ladder when climbing up or down as well as when while working on the ladders. Extension ladders must extend at least three feet above the platform landing. Step ladders may only be used in the fully open position. DO NOT stand above the second step from the top of a step ladder. DO NOT carry tools or materials up the ladder when climbing or descending. Always maintain a firm grip (3-point contact) when climbing or descending a ladder. All required ladder manufacturer warning and capacity labels must be in place and legible.
- 20) Any personnel operating equipment must be properly trained, and the Subcontractor must provide a completed Letter of Designation attesting to training. Forklift operators must have a training verification card in possession.
- 21) At no time may an employee use or store any unsafe material or defective tools or equipment on site.

Centennial reserves the right to remove individuals from the job site for first time safety infractions if they are deemed as a serious safety and health violation. The subcontractor will be notified, and Centennial will document the incident in accordance with its subcontractor Discipline Policy.

# Subcontractor Requirements

All personnel must be **trained in the hazards** associated with their job duties.

Each subcontractor is responsible for supplying their employees with all required personal protective equipment (PPE) for the task to be performed. At a minimum, your employees should always arrive with:

- Hard Hat
- Safety Glasses (ANSI Z87.1)
- Leather Work Boots (ASTM F2413)
- Hand Protection (minimum A2)

\*additional PPE may be required depending on task/location



# Subcontractor Requirements

Additionally, each subcontractor must provide their employees with their own:

- GFCI
- First Aid Kit/s (Class B)
- Fire Extinguisher (min 5 lb. ABC)



**\*\*The Centennial site representative must be notified prior to subcontractor personnel accessing the project site**



# Competent Person



Each subcontractor must designate a **Competent Person** prior to starting work. You can complete Centennial's Letter of Designation to identify your Competent, Qualified, or Authorized person/s for the project/task.

# CPR & 1<sup>st</sup> Aid

Subcontractors must provide a minimum of **two** people certified in CPR & 1<sup>st</sup> Aid for each Centennial site they occupy. A copy of the employee's card/certificate should be provided to a Centennial representative.

CPR & 1<sup>st</sup> Aid classes are available from:

- The American Red Cross
- The American Heart Association
- The American Safety & Health Institute
- Medic First Aid



**\*Centennial Provides 1<sup>st</sup> Aid & CPR training. Ask us about training your workers.**

Working alone is not permissible on Centennial projects unless coordinated with CCE prior to the work taking place and must meet specific criteria.

# Equipment Operation

Any personnel operating equipment must be properly trained. The subcontractor must provide a valid certification of training or complete a Letter of Designation prior to any equipment being operated.



# Clothing and Basic PPE

## Minimum Required PPE must be worn at all times!

**Hard Hats** - must have the brim facing forward and only manufacturer approved accessories may be attached. Unapproved headgear such as ball caps, hoodies, or wool caps/beanies may not be worn under any hard hat.



**Safety Glasses** – meeting ANSI Z87.1 (minimum) is required. Prescription glasses must have permanently affixed side shields. Snap on/slide on side shields are not permitted on Centennial sites.



# Clothing and Basic PPE

**Minimum Required PPE must be worn at all times!**

**Hand Protection** – Minimum ANSI cut level 2 rating gloves are required on all Centennial projects. Higher risk activities may require a higher-level cut resistance rating.



Old ANSI Cut-Resistant Levels (Grams)	New ANSI Cut-Resistant Levels (Grams)	Applications By Cut Level
1 (200)	A1 Light cut hazards (200)	Material handling, small parts assembly (sharp edges), packaging, warehouse, general purpose, forestry, construction, pulp and paper, automotive assembly
2 (500)	A2 Light/medium cut hazards (500)	Material handling, small parts assembly (sharp edges), packaging, warehouse, general purpose, forestry, construction, pulp and paper, automotive assembly
3 (1000)	A3 Light/medium cut hazards (1000)	Material handling, small parts assembly (sharp edges), packaging, warehouse, general purpose, forestry, construction, pulp and paper, automotive assembly
4 (1500)	A4 Medium cut hazards (1500)	Appliance manufacturing, bottle and light glass handling, canning, dry-val work, electrical, carpet installation, HVAC, pulp and paper, automotive assembly, metal fabrication and handling, packaging, warehouse, aerospace industry, food prep/processing
5 (3000)	A5 Medium/heavy cut hazards (3000)	Appliance manufacturing, bottle and light glass handling, canning, dry-val work, electrical, carpet installation, HVAC, pulp and paper, automotive assembly, metal fabrication and handling, packaging, warehouse, aerospace industry, food prep/processing
	A6 High cut hazards (3000)	Metal stamping, metal recycling, pulp and paper (changing roller blades), automotive assembly, metal fabrication, sharp metal stampings, glass manufacturing, window manufacturing, recycling plant/sorting, HVAC, food prep/processing, meat processing, aerospace industry
	A7 High cut hazards (4000)	Metal stamping, metal recycling, pulp and paper (changing roller blades), automotive assembly, metal fabrication, sharp metal stampings, glass manufacturing, window manufacturing, recycling plant/sorting, HVAC, food prep/processing, meat processing, aerospace industry
	A8 High cut hazards (5000)	Metal stamping, metal recycling, pulp and paper (changing roller blades), automotive assembly, metal fabrication, sharp metal stampings, glass manufacturing, window manufacturing, recycling plant/sorting, HVAC, food prep/processing, meat processing, aerospace industry
	A9 High cut hazards (8000)	Metal stamping, metal recycling, pulp and paper (changing roller blades), automotive assembly, metal fabrication, sharp metal stampings, glass manufacturing, window manufacturing, recycling plant/sorting, HVAC, food prep/processing, meat processing, aerospace industry

**Foot Protection** – Must be leather work boots or meet ASTM F2413 criteria to protect from slips, punctures and falling objects.





# Additional PPE

Additional PPE may be required depending on the task...

**Hearing protection** is required when sound levels meet or exceed 85 dBA.

- Air pods and other in-ear audio devices are **not** hearing protection

If **respiratory protection** is required, the subcontractor must provide the following:

- Respiratory Protection Plan
- Record of fit test
- Medical evaluation



- OSHA appendix D if respiratory protection is used voluntarily.

# Ladders

**All Ladders** must be labeled and rated heavy-duty (Type I, IA, or IAA) and be capable of supporting at least 250 lbs. or better. No Type II, III, or IV ladders are permitted on Centennial Projects.

- Extension ladders must:
  - extend three feet above the next level
  - Be secured from displacement both top and bottom
- Step Ladders must:
  - Only be used in the fully open position, unless designed by the manufacturer for other applications.
  - Stored laying down or secured (chain, wire rope) from falling if stored standing



**\*Standing on the top step or cap of a ladder is not permitted.**

# Fall Protection

Centennial requires fall protection when workers are six feet above the walking/working surface - **unless required at a lower elevation by state/local regulations.**

Workers needing to utilize fall protection must be trained on the hazards associated with working at heights, and in the use of the equipment they will be using to prevent injury from a fall.

Personal fall protection equipment must be inspected per the manufacturer's recommendations and prior to use each day.

# GFCI/Cords/Tools

All temporary electric tools and cords must be protected by a GFCI.

Hand and power tools must be in good working condition.

Power tools must meet the following requirements:

- Manufacturer required safety guards
- Manufacturer labels that are legible
- Cords without damage or defects
- Grounded or double insulated

All extension cords must be:

- Free from damage
- UL listed
- Designated for hard or extra hard use
- Minimum of 14 gauge / three wire type
- Protected against pinching, cutting, and creating other hazards



# Fire Protection

Fuel cans must be constructed of metal and incorporate a flame spark arrestor. The contents of any fuel can must be labeled per the OSHA Haz-Com Standard.

Each subcontractor must provide their employees with a current, appropriately sized ABC dry chemical fire extinguisher to meet the following:

- Minimum one on each floor or level they are working
- Within 25' of all hot work activities
- Within 50' of all flammable liquids
- Within 75' of all work areas

**\*Fire extinguishers must have an annual and monthly inspection tag**





# Hazard Communication

Subcontractors are required to have a written Hazard Communication Program which incorporates the use of the Globally Harmonized System (OSHA Haz-com Standard)

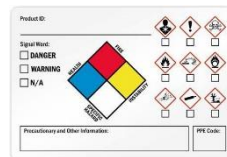


Subcontractors must provide Centennial's Superintendent with the Safety Data Sheets (SDS) for all hazardous materials and chemicals brought on the site.



SDS's shall be reviewed by subcontractor employees prior to using the hazardous material or chemical for required PPE, handling, storage, emergency response and disposal.

All chemicals shall have warning labels and placards affixed to warn employees of potential hazards.



# Scaffolds and Work Platforms

If scaffolding is to be utilized on the project, the following requirements must be met:

- Scaffolds must be inspected at the beginning of each shift by a competent person and “tagged” prior to, and when not in use.
- Fall protection (guardrails or PFAS) is required at 6’
- Must be fully cross braced



Workers are forbidden to utilize scaffolding if any of the following criteria is met:

- Improper planking
- Not fully planked
- Missing cross braces, pins, base plates, or mud sills.



Mobile scaffolds must be erected per the manufacturer’s instructions with all wheels locked while in use. No employees are permitted to be on a mobile scaffold when it is being moved.

# Supplemental Plans

Certain high-risk activities require supplemental plans for work to begin. These include:

- Fall Protection Work Plan
- Permit Required Confined Space Entry Plan
- Excavation and Trenching Plan
- Crane Lift and Rigging Plan
- Hydraulic Lifting Plan (Forklift/Excavator)
- Steel Erection Plan
- Shake-out and Unloading Plan
- HazMat Remediation Plans (Mold, Lead, Asbestos)
- Silica Written Exposure Control Plan
- Lockout/Tagout & Zero Voltage Verification Plan
- Energized Electrical Work Permit
- Tree Felling/Maintenance Plan

# Activity Hazard Analysis

The **AHA** is one of the most effective tools used to evaluate and mitigate risk. By completing a risk assessment and pre-planning, the best solution or risk control method can be developed to reduce injuries and illnesses. When used in conjunction with other applicable plans this tool provides the layout for integrating HSEQ into the work process.

Centennial requires each subcontractor to complete an AHA for each definable feature of work. This function should be completed on-site by the competent person, then signed by each effected employee prior to work commencing.

Severity	Probability				
	Frequent	Likely	Occasional	Seldom	Unlikely
Catastrophic	E	E	H	H	M
Critical	E	H	H	M	L
Marginal	H	M	M	L	L
Negligible	M	L	L	L	L

# Activity Hazard Analysis

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## Activity Hazard Analysis (AHA)

Company Name:							
Activity/Work Task:		Overall Risk Assessment Code (RAC) (Use highest code)					
Project Location:		<b>Risk Assessment Code (RAC) Matrix</b>					
Contract Number:		<b>Severity</b>	<b>Probability</b>				
Date Prepared:			Frequent	Likely	Occasional	Seldom	Unlikely
Prepared by (Name/Title):		Catastrophic	E	E	H	H	M
		Critical	E	H	H	M	L
Reviewed by (Name/Title):		Marginal	H	M	M	L	L
		Negligible	M	L	L	L	L
<p><b>Notes:</b> (Field Notes, Review Comments, etc.) PPE for all activities on site shall include at a minimum: ANSI Z89.1 Hardhat, ANSI Z87.1 safety glasses, leather work shoes or boots, short sleeve (min 4" sleeve) shirt, long pants and gloves meeting ANSI Cut Level A2 and Abrasion Level A2. High visibility vest (minimum class II), Class B First Aid Kit provided on-site. This AHA is required to be reviewed prior to the start of work and updated as necessary to reflect the scope of work and work procedures taking place. Report any unsafe acts or conditions to supervisor.</p>		<p>Step 1: Review each "Hazard" with identified safety "Controls" and determine RAC (See above)</p> <p>"Probability" is the likelihood to cause an incident, near miss, or accident and identified as: Frequent, Likely, Occasional, Seldom or Unlikely.</p> <p>"Severity" is the outcome/degree if an incident, near miss, or accident did occur and identified as: Catastrophic, Critical, Marginal, or Negligible</p> <p>Step 2: Identify the RAC (Probability/Severity) as E, H, M, or L for each "Hazard" on AHA. Annotate the overall highest RAC at the top of AHA.</p>					
<b>Job Steps</b>	<b>Hazards</b>	<b>Controls</b>					<b>RAC</b>



# Activity Hazard Analysis



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Equipment to be Used	Training Requirements/Competent or Qualified Personnel name(s)	Inspection Requirements

AHA Reviewed by Employees


If you need assistance developing your AHA(s), we can help!

# Hazard Reporting

## Stop work Authority – Everyone has it

Once a hazardous situation or condition has been identified, it must be corrected or guarded.

The party responsible for creating the hazard is also the one responsible for resolving it, unless other accommodations have been made.

All hazards must be reported to a Centennial representative.



# Incident Reporting

## **All Incidents must be reported immediately!**

Centennial requires all incidents to be reported to a Centennial representative as soon as it is safe to do so.

Events that qualify as an incident include:

- Personal Injury (first aid)
- Personal Injury (medical treatment)
- Property Damage
- Motor Vehicle Incident
- Near Miss
- Quality
- Environmental
- Unsafe Conditions



# Substance Abuse Policy

## Under the influence?

Centennial's Subcontractor Agreement requires any subcontractor employee involved in an incident is to submit to post incident substance abuse testing at a qualified laboratory.

Involved employee(s) must take the drug and/or alcohol (BAC) test within 24 hours of the incident.



# Substance Abuse

If it is suspected that a Subcontractor employee is under the influence, the Subcontractor must conduct a drug and alcohol (BAC) test. The employee will not be permitted to drive themselves to the testing facility.

Any subcontractor employee that refuses to test will be immediately suspended from working on all Centennial projects.

Your employee will not be allowed back on to a Centennial site until negative drug screen results are provided.



If your employee(s) test positive, criteria for re-instatement must be met and you may then request approval to return the employee(s) to Centennial projects.



# Regulatory Inspections

## What to do if OSHA shows up?

Do not leave!

If policies are being followed, there should not be much concern when/if a regulatory inspection takes place.

If an inspector does arrive and contacts one of your employees, they are to notify the Centennial site representative immediately.

Centennial has specific procedures to follow in the event of a regulatory inspection.

# HSEQ Non-Conformance

Centennial believes that HSEQ is unenforceable without a clearly outlined progressive consequence management procedure.

Written warnings are captured on the Subcontractor HSEQ Non-Conformance Form.

HSEQ violations are divided into three categories .

Category 1 – Severe Deviations

Category 2 – Major Deviations

Category 3 – Minor Deviations



Centennial reserves the right to remove individuals from the job site for first time safety infractions if they are deemed as a serious safety and health violation. The subcontractor's senior personnel will be notified, and Centennial will document the incident in accordance with our Subcontractor Discipline Policy.

# Safety at Your Fingertips

Centennial makes it easy for our subcontractor partners to access our HSEQ program.



The Centennial Safety Manual provides the structure and guidance for our rigorous and award-winning safety program. The manual has been developed over our 50-year history and is constantly updated as requirements change, safety improvements are made, and policies are modified.

SAFE BY DESIGN		
00 HSEQ COVER PAGE	UPDATED 01/01/2020	<a href="#">DOWNLOAD</a>
01 CENTENNIAL INTEGRATED HSEQ MANUAL 1.0	07/01/13	<a href="#">DOWNLOAD</a>
02 CENTENNIAL MANAGEMENT SYSTEM 2.1	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
03 KEY PERFORMANCE INDICATORS 2.1	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
04 EMPLOYEE PARTICIPATION AND REGISTRATION 2.2	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
05 TRAINING AWARENESS AND COMPETENCY 2.2	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
06 HSEQ RISK ASSESSMENT AND OPERATIONS 2.0	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
07 HSEQ INSPECTION SURVEILLANCE AND AUDIT 2.2	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>



Centennial's safety forms provide consistency across our organization. Forms are regularly shared with our clients and subcontractor partners.

SAFE BY DESIGN		
HSEQ JOBSITE RISKER	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
0 SITE SPECIFIC HSEQ PLAN	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
0.1 ACTIVITY HAZARD ANALYSIS	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
0.2 CENTENNIAL EMPLOYEE ACTIVITY HAZARD ANALYSIS	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
0.3 SUBCONTRACTOR QUALIFICATION FORM	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
0.4 CENTENNIAL SITE SAFETY RULES	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
0.5 HSEQ NON-CONFORMANCE FORM	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
0.6 HSEQ JOBSITE RISKER TABLE OF CONTENTS	07/01/13 06/01/2020	<a href="#">DOWNLOAD</a>
HSEQ JOBSITE RISKER		

Visit [www.cce-inc.com](http://www.cce-inc.com) and explore the “Safety” tab to access our HSEQ Manual, Safety Forms, and High-Risk Plans.

## Safety is our Focus!

There may be additional safety requirements not covered in this presentation. It is each subcontractor's responsibility to know the rules & regulations to maintain a safe work environment for their employees.

Centennial looks forward to partnering with you to increase worker safety!





The image shows three flags flying against a bright blue sky with some light clouds. The flag on the left is blue with a large white stylized 'B' logo. The middle flag is green with a white stylized 'B' logo. The flag on the right is white with a circular logo containing blue, green, and yellow segments. The text 'Thank you' is written in white in the upper right corner.

# Thank you