

Safety & Health Program Manual

2026 Edition • Revision 2.0

Effective August 2026

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What's New — 2026 Regulatory Update Summary

This edition of the 3F Construction LLC Safety & Health Program has been fully revised to reflect federal OSHA requirements in effect, or pending, as of August 2026. Key changes incorporated into this manual:

Change	What It Means for 3F	Where
PPE must properly fit (29 CFR 1926.95(c), eff. Jan. 13, 2025)	All PPE must be selected and provided so it properly fits each affected employee, including women and smaller- or larger-framed workers.	Section 10
HazCom aligned to GHS Rev. 7 (2024 final rule; dates extended Jan. 2026)	Updated labels/SDS formats. 3F must update its written program, workplace labeling, and training for substances by Nov. 20, 2026 (mixtures by May 19, 2028).	Section 11
Heat Injury & Illness NEP renewed Apr. 10, 2026; federal heat standard still proposed	Construction is a targeted industry for heat inspections. 3F maintains a written Heat Illness Prevention Plan enforced under the General Duty Clause.	Section 13
Electronic injury data submission (Injury Tracking Application)	Establishments with 20–249 employees in construction must e-submit Form 300A by March 2 each year; Form 300A must be posted Feb. 1 – Apr. 30.	Section 7
Worker walkaround representative rule (eff. May 31, 2024)	Employees may authorize an employee or non-employee third party as their representative during OSHA inspections.	Section 22
2026 OSHA civil penalties	Up to \$16,550 per serious/other-than-serious violation and \$165,514 per willful or repeated violation (2025 amounts carried into 2026).	Section 22

Structure. This program follows OSHA's Recommended Practices for Safety and Health Programs in Construction (OSHA Publication 3886): management leadership; worker participation; hazard identi-

fication and assessment; hazard prevention and control; education and training; program evaluation and improvement; and coordination on multiemployer worksites.

Safety Policy Statement

The management of 3F Construction LLC is committed to providing every employee a workplace free from recognized hazards, and to complying with the Occupational Safety and Health Act of 1970 and all applicable federal, state, and local requirements, including the OSHA construction standards at 29 CFR Part 1926.

Safety is a condition of employment and a core value equal in importance to production, quality, schedule, and cost. No task is so urgent that it cannot be performed safely. Employees are our most valued resource, and all necessary steps will be taken to protect their health and safety.

Every employee, subcontractor, and visitor on a 3F Construction project is expected to follow this program. Every worker has the authority — and the obligation — to stop work that presents an imminent danger, without fear of retaliation.

President / Principal, 3F Construction LLC

Date: _____

Policy Disclaimer and Informational Note

3F Construction LLC reserves the right to modify, add to, or delete any policy in this manual at any time. The rules set out here are as complete as we can reasonably make them; however, they are not all-inclusive, because circumstances we have not anticipated may arise. 3F Construction LLC may vary from the policies and provisions in this manual if, in its sole discretion, circumstances require.

This program addresses known and recognized hazards common to our operations, with emphasis on hazards that may exist on a job site. It is based on federal OSHA standards, applicable Illinois and City of Chicago requirements, and the collective experience of loss-control professionals. It supplements — and does not replace — task-specific training, manufacturer instructions, and the advice of qualified safety professionals for special hazards. Where any provision of this manual conflicts with a current OSHA standard, the OSHA standard governs.

Jurisdiction note: Illinois private-sector construction employers are covered by federal OSHA (Illinois OSHA covers state and local government employees only). Work in the City of Chicago must also comply with the Chicago Construction Codes (Title 14), Department of Buildings permit conditions, and public-way protection requirements. Illinois law (820 ILCS 630) requires OSHA 10-hour training for workers on public works projects.

1 Program Administration

1.1 Scope

This program applies to all employees of 3F Construction LLC and, through contract requirements, to subcontractors and lower-tier subcontractors on all projects, including multifamily and commercial construction, value-add apartment renovation, adaptive reuse, and single-family construction and rehabilitation.

1.2 Program Elements

- Management leadership and a written safety policy communicated to all workers
- Worker participation: hazard reporting, toolbox talks, stop-work authority, and program feedback
- Hazard identification and assessment: inspections, job hazard analyses (JHAs), and incident investigation
- Hazard prevention and control using the hierarchy of controls (elimination, substitution, engineering, administrative, PPE)
- Education and training, including new-hire orientation and OSHA 10/30-hour outreach training
- Program evaluation and improvement, reviewed at least annually
- Communication and coordination on multiemployer worksites

1.3 Points of Contact

Role	Name	Phone / Email
Program Administrator (Management)	Mike Obloy	312-296-4855 mobloy@3fconstruction.net
Safety Coordinator	Site Superintendent	312-296-4855
HR / Recordkeeping	Dawn Evans	(773) 441-4784 dawn@monroeresidential.com
Emergencies	911	OSHA 24-hour: 1-800-321-6742 (OSHA)

2 Responsibilities and Duties

2.1 Management

- Provide the resources, authority, and accountability needed to implement this program
- Visit job sites to conduct safety audits of personnel, equipment, and materials
- Evaluate, assess, and update safety procedures and policies for the benefit of employees and clients
- Ensure compliance with all regulatory bodies and standards (OSHA, EPA, Illinois, City of Chicago)
- Analyze incident reports and injury trends; lead injury and incident inquiries and evaluations
- Prepare and conduct safety training sessions for employees and vendors
- Set the example: follow all site rules, including PPE, on every visit

2.2 Safety Coordinator

- Plan and implement safety standard operating procedures and this written program
- Advise and lead employees on safety-related topics and conduct risk assessments
- Manage new-employee safety onboarding with HR, and maintain training records
- Conduct and document jobsite inspections; verify corrective actions are completed
- Prepare and present reports on incidents and violations and determine root causes
- Maintain the OSHA 300 log, post the 300A summary (Feb. 1 – Apr. 30), and complete Injury Tracking Application electronic submissions by March 2
- Coordinate industrial hygiene monitoring (silica, lead, noise) when required

2.3 Superintendents / Supervisors

- Implement the site-specific safety plan; remain accountable for the safe performance of personnel and equipment on their projects
- Ensure new employees receive documented orientation before starting work and are paired with experienced workers
- Hold safety meetings with foremen at least biweekly; ensure weekly toolbox talks are held and documented for all project personnel, including sub-trades
- Make daily observations of site conditions and work practices; correct hazards immediately or stop the affected work
- Serve as (or designate) the competent person for fall protection, scaffolds, excavations, and ladders, as applicable
- Accompany OSHA compliance officers during inspections (or designate another supervisor), and notify management immediately of any inspection
- Investigate all incidents and near misses on their project and submit reports within 24 hours

- Enforce the disciplinary procedure fairly and consistently

2.4 Employees

- Learn and follow the hazards and safe practices of your job; abide by all safety rules and use required PPE
- Report unsafe acts, unsafe conditions, injuries, and near misses to your supervisor immediately
- Participate in weekly toolbox meetings and required training
- Communicate safety to fellow employees and make suggestions to improve safety
- Exercise stop-work authority when an imminent danger exists

2.5 Subcontractors

- Comply with this program, their own OSHA-compliant safety programs, and all site-specific rules — whichever is most protective
- Provide competent persons for their trade activities and attend site coordination and toolbox meetings
- Report all incidents, injuries, and near misses to the 3F superintendent the same day
- Provide SDSs for chemicals brought on site before use

See Section 21 for the Multiemployer Worksite Policy.

3 Employee Participation, Hazard Reporting, and Anti-Retaliation

Employees must notify management of unsafe acts or conditions and will receive a timely response. Employee insight gives management a greater perspective of possible unsafe acts or conditions while actively involving employees in safety and health decisions.

3.1 How to Report

- Verbally to any supervisor or the Safety Coordinator — immediately for imminent dangers
- In writing using the Employee Hazard Report (Appendix E); reports may be submitted anonymously
- Action will be taken whether the report is signed or not, and the reporter (if known) will be told what was done and why

3.2 Stop-Work Authority

Every worker on a 3F Construction site — employee or subcontractor — has the authority to stop work that presents an imminent danger to life or health. Work may resume only after the condition is corrected and the supervisor authorizes restart. No worker will be disciplined for a good-faith stop-work call, even if it turns out to be unfounded.

3.3 Anti-Retaliation

Section 11(c), OSH Act; 29 CFR 1904.35–1904.36

3F Construction LLC will not discharge, discipline, or in any manner discriminate against any employee for reporting an injury, illness, or hazard; filing an OSHA complaint; participating in an inspection or proceeding; or exercising any right under the OSH Act. Our incident-reporting procedures are reasonable and do not deter or discourage reporting. Employees may contact OSHA at 1-800-321-6742 or www.osha.gov; retaliation complaints to OSHA must be filed within 30 days.

4 Safety Accountability and Disciplinary Procedure

To ensure consistency in the application of safety-related disciplinary action, the following procedure applies to all employees. Any member of 3F Construction management or supervision may enforce it. Discipline is applied to the failure to follow safety requirements — never to the good-faith reporting of an injury or hazard.

Examples of violations covered by this program include, but are not limited to: not following verbal or written safety procedures; failure to wear required PPE; abuse of PPE; removing guards or defeating safety devices; and unsafe operation of tools, equipment, or vehicles.

4.1 Progressive Steps

1. First violation — documented verbal warning (recorded in the employee's personnel file).
2. Second violation — written warning, signed by the issuer and the employee, filed in the personnel file.
3. Third violation — one day off without pay, documented in the personnel file.
4. Fourth violation — termination may result.

Each violation starts or continues a rolling 12-month cycle. If no further violations occur within 12 months, the employee returns to a clean slate. The purpose of accountability is to help employees work safely — not to end employment.

4.2 Major Infractions

A supervisor or manager may suspend or discharge an employee for a first offense in the case of a major infraction, including but not limited to:

- Violation of the Company's Alcohol, Drug, and Unauthorized Substance Abuse Policy
- A reckless or deliberate act that causes (or could cause) serious injury to oneself, coworkers, or others, or serious damage to property or equipment
- Working at height without required fall protection; entering an unprotected trench; defeating lockout or energized-work protections
- Fighting, violence, or harassment on a job site

The Employee Warning Notice (Appendix B) must be completed and returned to HR whenever disciplinary action is taken. All employees must sign the program acknowledgment (Appendix A); one copy is kept in the Safety Program Book and one in the employee's file.

5 Training and Orientation

29 CFR 1926.21(b)(2) – the employer shall instruct each employee in the recognition and avoidance of unsafe conditions

5.1 New-Hire Safety Orientation

Before starting work, every new employee receives a documented orientation (Appendix F checklist) covering: this program and site rules; hazard reporting and stop-work authority; PPE selection, fit, and care; fall protection; emergency procedures; first aid locations; HazCom and SDS access; and the disciplinary procedure. New employees are assigned to work with experienced employees familiar with the project. Short-service employees (first 90 days) receive increased supervision.

5.2 Required and Recommended Training

Training	Who	Frequency
OSHA 10-Hour Construction	All field employees (required by Illinois law on public works projects; 3F policy for all field staff)	Once; refresher every 5 years recommended
OSHA 30-Hour Construction	Superintendents, foremen, Safety Coordinator	Once; refresher every 5 years recommended
New-hire orientation	All employees	Before first assignment
Toolbox talks	All site personnel	Weekly, documented (Appendix G)
Fall protection (1926.503)	All exposed employees	Initial + retraining on deficiency/change
HazCom / GHS Rev. 7 (1910.1200)	All employees using or exposed to chemicals	Initial + when new hazards introduced; updated training for revised label/SDS elements by Nov. 20, 2026
Silica awareness (1926.1153)	Employees performing Table 1 tasks	Initial + annual review
Heat illness prevention	All field employees and supervisors	Annually before warm season + new-hire
Ladder & scaffold safety	Users; competent person for scaffolds	Initial + retraining as needed
First aid / CPR	Designated responders (at least one per site when a clinic/hospital is not reasonably accessible)	Per certificate (typically 2 years)

Training	Who	Frequency
Powered industrial trucks / aerial lifts	Operators	Initial + evaluation every 3 years

5.3 Competent Persons

A competent person — one who can identify existing and predictable hazards and has authority to correct them — is designated in writing for each project for: fall protection, scaffolds, excavations, ladders, and any other activity where a standard requires one. Names are recorded on the site-specific safety plan.

6 Hazard Identification, Job Hazard Analysis, and Inspections

6.1 Jobsite Surveys and Inspections

A survey of each workplace is made to identify hazards or potential hazards. Deliberately check inside, outside, and around operations, focusing on the occupancy, operations, machines, processes, and activities of the project. Findings are documented, prioritized by severity and likelihood, and corrected — eliminating the hazard where possible, otherwise managing the risk through the hierarchy of controls.

- Superintendent: daily walk-through of active work areas
- Documented site inspection (Appendix H checklist): weekly, and after significant weather, phase changes, or incidents
- Safety Coordinator / management audits: periodic, unannounced
- Equipment inspections: per manufacturer and OSHA requirements (scaffolds each shift, excavations daily, rigging before each use, etc.)

6.2 Job Hazard Analysis (JHA)

A JHA is prepared for high-hazard or non-routine tasks (work at height, demolition, excavation, hot work, energized work, confined spaces, heavy hoisting). The JHA breaks the task into steps, identifies the hazards of each step, and assigns controls. Crews review the JHA before starting the task and whenever conditions change. A last-minute risk assessment ('stop and think') is expected before every task.

6.3 Risk Tolerance

Understanding risk tolerance is key to improving safety performance. Three cognitive processes occur when assessing hazards: hazard identification (Do I see it?), risk perception (Do I understand it?), and risk tolerance (Do I accept or reject it?). Most incidents involve a risk that was seen but accepted.

The ten factors that inflate risk tolerance — overestimating capability or experience; familiarity with the task (complacency); underestimating the seriousness of the outcome; voluntary actions and feeling in control; lack of personal experience with a serious outcome; low perceived cost of noncompliance; overconfidence in equipment; overconfidence in PPE; profit or gain from shortcuts; and role models accepting risk — are covered in training and toolbox talks. Supervisors are expected to recognize these factors in themselves and their crews, and to use JHAs, last-minute risk assessments, and peer-to-peer safety conversations to counter them.

7 Incident Reporting, Investigation, and OSHA Recordkeeping

7.1 Employee Reporting

Report all injuries, illnesses, and near misses to your supervisor immediately, whether or not anyone is hurt. In case of injury, get first aid as soon as possible. The First Aid Treatment Form (Appendix D) is completed for every first-aid episode, including refused treatment.

7.2 Reports to OSHA

29 CFR 1904.39

Mandatory deadlines

Work-related fatality — report to OSHA within 8 hours.

Work-related in-patient hospitalization, amputation, or loss of an eye — report within 24 hours.

How: 1-800-321-6742 (OSHA), the nearest OSHA Area Office (Chicago: 312-353-2220), or [osha.gov](https://www.osha.gov). Only the Safety Coordinator or management makes this report after immediate notification from the site.

7.3 Incident Investigation

Accidents and near misses expose hazards. Every recordable injury, and every near miss with serious potential, is investigated using the Supervisor's Report of Injury or Illness (Appendix C) to record the incident, determine root causes (why was the unsafe act committed? why did the unsafe condition exist?), and plan corrective follow-up to prevent recurrence. The scene is preserved for serious incidents until the investigation is complete. Findings are shared with affected crews and tracked to closure by the Safety Coordinator.

7.4 Recordkeeping (29 CFR Part 1904)

- OSHA Form 300 — log each recordable injury/illness within 7 calendar days of learning of it.
- OSHA Form 301 (or equivalent) — incident report completed for each recordable case within 7 days.
- OSHA Form 300A — annual summary certified by a company executive and posted at each establishment from February 1 through April 30.
- Electronic submission — establishments with 20–249 employees in construction (NAICS 236) must submit Form 300A data through OSHA's Injury Tracking Application by March 2 each year; establishments with 100+ employees in designated industries also submit Forms 300/301 data.
- Retention — five years, updated as cases develop. Employee privacy cases are handled per 1904.29(b)(6)–(10).

Companies with 10 or fewer employees at all times during the year are partially exempt from routine 300-log recordkeeping, but the 8/24-hour fatality and severe-injury reports to OSHA are always required.

8 The Focus Four Hazards

OSHA's 'Focus Four' cause the large majority of construction fatalities. Every 3F project plans for them explicitly:

- **Falls** — the leading killer in construction. See Section 9.
- **Struck-by** — vehicles, falling/flying objects, rigging failures. Controls: high-visibility apparel near equipment and traffic; spotters for backing equipment; never position under suspended loads; debris netting/canopies and hard-hat zones; secure materials stored at height.
- **Caught-in/between** — trench cave-ins, rotating equipment, pinch points. Controls: protective systems for excavations (Section 16), machine guarding, lockout, and keeping clear of swing radii.
- **Electrocution** — contact with power lines and energized parts. See Section 14.

9 Fall Protection Program

29 CFR 1926 Subpart M (fall protection), Subpart X (ladders/stairways), Subpart L (scaffolds)

9.1 General Requirements

- Protection is required at 6 feet or more above a lower level: guardrails, safety nets, or personal fall arrest systems (PFAS)
- Holes and skylights: covers secured and marked 'HOLE' or 'COVER', or guardrails
- Leading edges, unprotected sides and edges, excavations 6 ft deep, and wall openings must be protected
- Low-slope roofs: guardrails, PFAS, or safety monitoring systems with warning lines as allowed; steep roofs: guardrails with toeboards, nets, or PFAS
- A written site-specific fall protection plan is prepared for each project with work at height; a competent person is designated

9.2 Residential Construction

Under 29 CFR 1926.501(b)(13), employees engaged in residential construction 6 feet or more above lower levels must be protected by conventional fall protection (guardrails, nets, or PFAS) unless the employer demonstrates infeasibility or a greater hazard and implements a written, site-specific alternative plan meeting 1926.502(k). 3F Construction treats alternative plans as a last resort requiring management approval.

9.3 Personal Fall Arrest Systems

- Full-body harness, shock-absorbing lanyard or SRL, and anchorage capable of 5,000 lb per worker (or engineered at 2:1 safety factor under qualified-person supervision)
- PFAS must properly fit the individual worker (see Section 10); inspect before each use; remove damaged or impact-loaded equipment from service
- Free-fall limited to 6 ft; total fall clearance calculated before use; prompt-rescue plan required before PFAS work begins (self-rescue, ladder/lift access, or 911 coordination)

9.4 Ladders

- Inspect before use; remove defective ladders from service and tag 'Do Not Use'
- Extension ladders: 4:1 angle, secured, extending 3 ft above the landing; maintain 3 points of contact; do not carry loads that could cause loss of balance
- Stepladders used fully opened with spreaders locked; never stand on the top cap or top step
- Portable ladders with structural defects, oil/grease on rungs, or missing feet are prohibited
- Fiberglass or wood ladders (non-conductive) near electrical work

9.5 Scaffolds

- Erected, moved, altered, and dismantled under a competent person; inspected by the competent person before each work shift and after any event that could affect structural integrity

- Full planking, guardrails at 10 ft, safe access (no climbing cross-braces), base plates/mud sills, plumb and level
- Capacity: support 4 times the maximum intended load; do not overload
- Keep 10 ft clearance from power lines (more for higher voltages)

9.6 Aerial and Scissor Lifts

- Only trained, authorized operators; body harness with lanyard attached to the boom/basket anchor in boom lifts
- Stand on the floor of the basket — never on rails or planks placed on rails; maintain safe distances from power lines
- Inspect controls and safety devices daily before use

10 Personal Protective Equipment (PPE)

29 CFR 1926 Subpart E; 1926.95(c) as amended effective January 13, 2025

New — PPE must properly fit (effective Jan. 13, 2025)

OSHA amended 29 CFR 1926.95(c) to require that all PPE in construction properly fit each affected employee. ‘Universal fit’ is no longer acceptable where it does not actually fit the worker — this especially affects women and workers with smaller or larger frames.

3F Construction stocks or orders PPE in a range of sizes, verifies fit at issue (harnesses, gloves, eye protection, hi-vis apparel, respirators), and replaces PPE that does not fit. Report ill-fitting PPE to your supervisor — it will be replaced at no cost to you.

10.1 Hazard Assessment and Selection

PPE is selected based on a documented hazard assessment of each project and task. PPE is the last line of defense and never a substitute for feasible engineering or administrative controls. Required PPE is provided at no cost to employees (except items excluded by 1926.95(d), such as everyday safety-toe footwear permitted off site).

10.2 Minimum Site PPE

- Hard hat (ANSI Z89.1) — at all times on active sites; inspect shell and suspension regularly
- Safety glasses (ANSI Z87.1) — at all times; face shield over glasses for grinding, cutting, chipping
- Safety-toe footwear (ASTM F2413)
- High-visibility apparel near vehicles, equipment, or public traffic
- Work gloves appropriate to the task (cut-resistant for sharp materials; chemical-resistant per SDS)
- Hearing protection at 85 dBA TWA or where you must raise your voice to be heard at 3 feet
- Respirators when required by exposure assessment (silica, lead, dusts) — used under a written respiratory protection program (1926.103/1910.134) with medical evaluation, fit testing, and training

10.3 Care and Responsibility

Employees must wear the PPE required for their job as established through job instruction, keep it in good repair, and report damaged or ill-fitting equipment to their supervisor immediately. Damaged PPE is replaced before work continues. Abuse of PPE is a disciplinary violation.

11 Hazard Communication (HazCom / GHS)

29 CFR 1910.1200, applied to construction through 1926.59 – as amended by the 2024 final rule (GHS Revision 7)

2026 compliance dates (as extended January 2026)

Chemical manufacturers must ship substances with updated GHS Rev. 7 labels/SDSs by May 19, 2026 (mixtures by Nov. 19, 2027).

Employers — 3F Construction — must update workplace labeling, this written program, and employee training for substances by November 20, 2026, and for mixtures by May 19, 2028. Expect to see updated SDS formats and label elements arriving from suppliers now.

11.1 Program Elements

- **Chemical inventory** — maintained per project and updated as products arrive; subcontractors provide SDSs before bringing chemicals on site
- **Safety Data Sheets** — readily accessible to all employees during each shift (binder in the site office and/or electronic access); no product is used without an SDS
- **Labels** — shipped containers keep manufacturer GHS labels (pictograms, signal word, hazard and precautionary statements); secondary/workstation containers labeled with product identity and hazard information; never use unlabeled containers, and never store chemicals in food or drink containers
- **Training** — before initial assignment and when new hazards are introduced: reading labels and SDSs, physical/health hazards of site chemicals, protective measures, and location of this written program
- **Non-routine tasks and multiemployer exchange** — hazards communicated between 3F and subcontractors whose work may expose the other's employees

12 Respirable Crystalline Silica

29 CFR 1926.1153 – an active OSHA National Emphasis Program enforcement priority

Cutting, grinding, drilling, or demolishing concrete, masonry, brick, block, mortar, tile, or stone generates respirable crystalline silica. The action level is 25 $\mu\text{g}/\text{m}^3$ and the PEL is 50 $\mu\text{g}/\text{m}^3$ (8-hour TWA).

12.1 Controls

- 3F follows Table 1 of 1926.1153 for listed tasks: integrated water delivery or shrouded tools with HEPA dust collection, used exactly as specified, with the respiratory protection Table 1 assigns for the task and duration
- Tasks not on Table 1 (or not performed per Table 1) require exposure assessment and compliance with the PEL
- Housekeeping: no dry sweeping or compressed air on silica dust — use HEPA vacuums or wet methods
- A written Exposure Control Plan is maintained; a competent person implements it on site and restricts access to high-dust areas
- Medical surveillance is offered to employees required to wear a respirator for silica 30+ days per year

13 Heat and Cold Illness Prevention

2026 status — heat enforcement

OSHA's proposed Heat Injury and Illness Prevention standard (NPRM Aug. 2024) has not been finalized, but OSHA renewed its Heat National Emphasis Program on April 10, 2026, and construction is a targeted industry. Heat hazards are cited under the General Duty Clause. This plan is mandatory 3F policy.

13.1 Heat Illness Prevention Plan

- **Water** — cool drinking water at no cost, readily accessible: at least one quart per employee per hour in hot conditions; encourage drinking every 15–20 minutes
- **Rest and shade** — shaded or air-conditioned break areas; scheduled rest breaks that increase with heat index; adjust work hours toward cooler parts of the day when feasible
- **Acclimatization** — new and returning workers are phased into hot work over 1–2 weeks (rule of thumb: start at 20% exposure, increase no more than 20% per day); heightened supervision during heat waves
- **Monitoring and triggers** — supervisors check the forecast/heat index daily; at a heat index of 80°F implement water/shade/breaks and a buddy system; at 90°F+ add mandatory rest cycles, more frequent checks, and consider rescheduling heavy work
- **Training** — annually and at hire: heat illness signs (cramps, exhaustion, heat stroke), risk factors (PPE, humidity, medications), first aid, and emergency response
- **Emergency response** — suspected heat stroke (confusion, collapse, hot dry skin) is a 911 emergency: move to shade, aggressively cool with water/ice while waiting, never leave the worker alone

13.2 Cold Stress (Chicago Winters)

- Layered, dry clothing; insulated gloves and head protection; warm break areas and warm liquids
- Schedule outdoor work for the warmest part of the day; use a buddy system in extreme cold
- Train crews on frostbite and hypothermia signs; treat suspected hypothermia as an emergency
- Guard against slips on ice and snow: de-ice walkways and working surfaces before work

14 Electrical Safety and Control of Hazardous Energy

29 CFR 1926 Subpart K; 1926.416–417 (lockout/tagging in construction)

- Only qualified, authorized persons repair electrical devices or equipment; electrical equipment is never tampered with
- Ground-fault circuit interrupters (GFCIs) protect all 120-volt, single-phase, 15- and 20-amp receptacle outlets on site that are not part of the permanent wiring (or an assured equipment grounding conductor program)
- Inspect cords and tools daily; remove damaged cords from service; no flat cords, no cords through doorways/water without protection; extension cords must be heavy-duty (hard or extra-hard usage)
- De-energize and lock/tag circuits and equipment before repair, oiling/greasing, or maintenance; the main switch is placed in the OFF position when setting up jobs or leaving machines idle; switch box and panel covers kept closed
- Overhead power lines: maintain at least 10 ft of clearance (more above 50 kV); call the utility to de-energize/insulate lines when work must be closer; underground — call JULIE/811 before digging
- Live-work (troubleshooting) only by qualified persons with appropriate PPE and permits

15 Hand and Power Tools; Machine Guarding

29 CFR 1926 Subpart I

- Use only tools you are trained, qualified, and authorized to use; use the right tool for the job
- Inspect before use; damaged, mushroomed, split, or defective tools are tagged out of service
- Guards stay in place and functional; no guard is removed without supervisor permission and proper procedures; keep all mechanical safeguards in position during operation
- Powder-actuated tools only by trained/certified operators
- Compressed air is never used for cleaning clothing, cooling off, or horseplay; cleaning use limited to less than 30 psi with chip guarding and PPE
- Saws: use blade guards, push sticks, and hearing/eye protection; abrasive wheels ring-tested and properly mounted
- Company tools and equipment are not used for personal purposes

16 Excavation and Trenching

29 CFR 1926 Subpart P

- Call JULIE (811) at least 48 hours (2 business days) before digging anywhere in Illinois; locate and mark all utilities
- A competent person inspects excavations, adjacent areas, and protective systems daily before work, after rainstorms, and as needed
- Trenches 5 feet or deeper require a protective system: sloping, benching, shoring, or trench shields per Subpart P (in Type C soil assume 1.5:1 slope unless a competent person classifies otherwise); at 20+ ft a registered professional engineer designs the system
- Ladder, ramp, or other safe egress within 25 lateral feet of workers in trenches 4 ft or deeper
- Spoils, materials, and equipment kept at least 2 feet from the edge; no workers under loads or in the swing radius of digging equipment
- Water accumulation, hazardous atmospheres, and adjacent structures addressed before entry

17 Confined Spaces

29 CFR 1926 Subpart AA

Confined spaces on our projects may include manholes, vaults, pits, crawl spaces with limited entry, tanks, and sewers. Before any employee enters a confined space, a competent person identifies and evaluates the space. Permit-required confined spaces (hazardous atmosphere, engulfment, entrapment, or other serious hazard) require a written permit program: atmospheric testing, ventilation, attendant, rescue plan, and entry permit. 3F Construction's default policy is that employees do not enter permit-required confined spaces unless the full permit program is implemented; otherwise the work is assigned to a qualified subcontractor with its own compliant program, coordinated with 3F.

18 Lead, Asbestos, and Regulated Materials in Renovation

29 CFR 1926.62 (lead); 29 CFR 1926.1101 (asbestos); EPA RRP Rule, 40 CFR Part 745

Much of our renovation and adaptive-reuse work involves buildings that may contain lead-based paint (pre-1978) or asbestos-containing materials. Before disturbing existing finishes or materials:

- Pre-1978 residential and child-occupied buildings: renovations that disturb painted surfaces beyond de minimis amounts must follow the EPA Renovation, Repair and Painting (RRP) Rule — firm certification, a certified renovator on site, lead-safe work practices, containment, and cleaning verification
- Suspect asbestos-containing materials (pipe insulation, floor tile, mastics, plaster, roofing) are presumed positive until sampled by a licensed inspector; abatement is performed only by licensed abatement contractors under Illinois Department of Public Health requirements
- OSHA exposure assessments and protective measures per 1926.62 and 1926.1101 whenever employees may disturb lead or asbestos
- Mold, bird/rodent droppings, and other biological hazards evaluated before demolition or crawl-space work; PPE and controls assigned by the JHA
- Demolition work is planned under 29 CFR 1926 Subpart T, including a pre-demolition engineering survey

19 Fire Prevention, Housekeeping, Hot Work, and First Aid

29 CFR 1926 Subparts C, F; 1926.150–155

19.1 Fire Prevention and Protection

- Fire extinguishers (minimum 2A) within 100 feet of employees on each floor, and within 50 feet of every 5 gallons of flammable liquids; extinguishers inspected monthly and kept unobstructed
- Fire extinguishers, sprinklers, hydrants, and fire exits are never blocked by supplies, stock, or parts
- Flammable liquids only in approved safety cans with self-closing lids and flame arresters — never in open containers; storage away from ignition sources and exits
- No smoking near flammable storage, fueling, or as posted
- Hot work (welding, cutting, brazing, grinding with sparks): remove or protect combustibles within 35 feet, provide a fire watch during work and at least 30 minutes after, and use a hot-work permit where required by the site or insurer
- Temporary heating devices used with clearance, ventilation, and tip-over protection per manufacturer and 1926.154

19.2 Housekeeping

- Work areas, passageways, and stairs kept clear of debris, cords, and materials; clean as you go — daily at minimum
- Protruding nails bent or pulled; materials stacked stable and secure; walkways lighted
- Waste removed regularly; separate containers for hazardous waste where applicable

19.3 First Aid and Medical

29 CFR 1926.50

- When a clinic or hospital is not reasonably accessible (time/distance) to the site, at least one person on site holds a valid first-aid/CPR certificate
- Weatherproof first-aid kits on every site, checked weekly and restocked; eyewash provision where corrosives are used
- First aid is administered only by trained/authorized personnel; never attempt to remove foreign objects from a coworker's eyes or ears — seek medical care
- Every first-aid episode is documented on the First Aid Treatment Form (Appendix D), including offered-but-refused treatment or transport

20 Emergency Action Plan

29 CFR 1926.35

Each project maintains a site-specific emergency action plan covering, at minimum:

- Emergency escape procedures and route assignments, posted with a site map
- A muster point and a method to account for all employees and subcontractors after evacuation
- Procedures for reporting fires, medical emergencies, severe weather, gas leaks, and structural concerns; 911 address and nearest hospital posted at the site office
- Alarm/notification method recognizable by all site personnel (air horn signals or equivalent)
- Rescue and medical duties for designated employees; utility shutoff locations identified
- Severe-weather (tornado/lightning/high-wind) triggers: crane and lift shutdown, work-at-height suspension, shelter locations
- Training on the plan at orientation and whenever it changes; a drill is conducted for long-duration projects

21 Subcontractor Management and Multiemployer Worksites

OSHA Multi-Employer Citation Policy, CPL 2-0.124

As general contractor and construction manager, 3F Construction is frequently the 'controlling employer' on multiemployer worksites and can be cited for hazards it controls even when its own employees are not exposed. Accordingly:

- Subcontracts require compliance with this program, all OSHA standards, and site rules; each subcontractor provides its safety program, applicable competent-person designations, SDSs, and training verification before mobilizing
- Pre-construction and weekly coordination meetings address trade-by-trade hazards, protection of shared systems (guardrails, hole covers), and scheduling of high-hazard work
- 3F superintendents exercise reasonable care to detect and require correction of violations by any employer on site; uncorrected serious hazards escalate to stop-work and contractual remedies
- Subcontractors report all injuries and near misses to the 3F superintendent the same day; OSHA-reportable events are communicated to 3F management immediately
- Host/occupied-building coordination: in occupied renovation projects, tenant protection (dust barriers, egress maintenance, after-hours noise/utility coordination) is part of the site plan

22 OSHA Inspections and Enforcement

22.1 During an Inspection

- The superintendent greets the compliance officer, verifies credentials, notifies 3F management immediately, and accompanies the officer at all times (or designates another supervisor)
- Employees may authorize a representative — including a non-employee third party — to accompany the compliance officer during the walkaround (OSHA walkaround rule, effective May 31, 2024)
- Provide documents that are required to be produced (300 logs, written programs); take parallel photos/notes of anything the officer documents; correct simple hazards on the spot
- Employees have the right to speak privately with the compliance officer; no one may retaliate for participation

22.2 2026 Civil Penalty Levels

Violation Type	Maximum Penalty (2026)
Serious	\$16,550 per violation
Other-than-serious	\$16,550 per violation
Posting requirements	\$16,550 per violation
Failure to abate	\$16,550 per day beyond the abatement date
Willful or repeated	\$165,514 per violation

Note: 2025 penalty amounts remained in effect for 2026 because the October 2025 CPI data needed for the annual inflation adjustment was not produced. Amounts are expected to rise again in 2027 — check [osha.gov/penalties](https://www.osha.gov/penalties) for current figures.

23 General Safety Rules

These rules apply to everyone on a 3F Construction site. Violations are subject to the disciplinary procedure in Section 4.

1. Follow established safe job procedures. Perform only the jobs you have been assigned and properly instructed to perform.
2. Wear the PPE required for your job. Keep it in good repair and report damaged or ill-fitting equipment to your supervisor immediately.
3. Report unsafe acts or unsafe conditions to your supervisor without delay.
4. Report all accidents and near misses to your supervisor immediately, whether anyone is hurt or not. In case of injury, get first aid as soon as possible.
5. Keep all machine safeguards in position during operation. Never remove a guard without supervisor permission and proper procedures.
6. Place the main switch in the OFF position when making adjustments, setting up jobs, or when a machine will be idle. Never leave machinery operating unattended. Lock and tag energy sources before repair or maintenance.
7. Use only machinery, equipment, and tools you are qualified and authorized to use.
8. No horseplay — scuffling, practical jokes, or throwing objects.
9. Only authorized, qualified persons may repair electrical devices or equipment.
10. Keep switch box and fuse station covers closed at all times.
11. Walk — do not run — within work areas.
12. Never use compressed air for cleaning clothes, cooling off, or pranks; serious injury or death can result.
13. Never block fire extinguishers, sprinklers, or fire exits.
14. Use flammable liquids only from approved safety containers — never open containers.
15. First aid is given only by trained, authorized personnel. Never attempt to remove foreign objects from a coworker's eyes or ears.
16. Do not ride hand trucks, material hoists not designed for personnel, or hitch rides on forklifts or equipment.
17. Company tools, machinery, and equipment are not for personal use.
18. Only qualified maintenance personnel authorized by supervision may repair machinery and equipment.
19. Seat belts are worn in all vehicles and mobile equipment; mobile phones are not used while operating vehicles or equipment.

20. Alcohol, cannabis, and unauthorized drugs are prohibited on all sites; impairment is a major infraction.
21. Housekeeping is everyone's job — clean as you go.

Appendix — Forms

The following master forms support this program. Photocopy or reprint as needed; do not use the master. Completed forms are returned to the Safety Coordinator / HR as indicated. (This edition consolidates the duplicate form copies from the prior manual into a single master of each.)

- Appendix A — Employee Acknowledgment of Safety Program
- Appendix B — Employee Warning Notice
- Appendix C — Supervisor's Report of Injury or Illness
- Appendix D — First Aid Treatment Form
- Appendix E — Employee Hazard Report
- Appendix F — New-Hire Safety Orientation Checklist
- Appendix G — Toolbox Talk / Safety Meeting Record
- Appendix H — Jobsite Safety Inspection Checklist

OSHA Forms 300, 300A, and 301: current fillable versions are downloaded from [osha.gov/record-keeping/forms](https://www.osha.gov/record-keeping/forms) and kept by the Safety Coordinator. Insert the current year's forms behind Appendix H.

Appendix A — Employee Acknowledgment of Safety Program

Employee Acknowledgment of Safety Program

3F Construction LLC • 202 N. Justine Street, Chicago, IL 60607 • (312) 296-4855

I acknowledge that I have received the 3F Construction LLC Safety & Health Program (2026 Edition), that its contents have been explained to me, and that I have had the opportunity to ask questions. I understand that compliance with this program is a condition of employment, that I must report injuries and hazards immediately, and that I have stop-work authority for imminent dangers.

Employee name (print) _____

Employee signature _____ Date _____

Supervisor / trainer _____ Date _____

Distribution: one copy to the Safety Program Book, one copy to the employee's personnel file.

Appendix B – Employee Warning Notice

Employee Warning Notice

3F Construction LLC • 202 N. Justine Street, Chicago, IL 60607 • (312) 296-4855

Employee _____ Department / crew _____

Supervisor _____ Date of notice _____

Date of incident _____ Time _____

Location / project _____

Previous warnings	Oral	Written	Date	By whom
1st warning				
2nd warning				
3rd warning				

Employer statement (rule or procedure violated; corrective action required):

Employee statement: I ☐ agree ☐ disagree with the employer's statement. Reasons:

Action to be taken: ☐ Warning ☐ Probation ☐ Suspension ☐ Dismissal ☐ Other: _____

Consequences should the conduct occur again:

I have read this warning and understand it.

Employee signature _____ Date _____

Supervisor signature _____ Date _____

Return the completed form to HR as soon as disciplinary action is taken.

Appendix C — Supervisor's Report of Injury or Illness

Supervisor's Report of Injury or Illness

3F Construction LLC • 202 N. Justine Street, Chicago, IL 60607 • (312) 296-4855

Type of injury: ☐ Disabling ☐ Medical ☐ Illness ☐ First aid only ☐ Near miss

Name of employee _____ Occupation _____

Project / place of incident _____ Date and time _____

Years of experience _____ Witnesses _____

Care provided: ☐ Sent to doctor ☐ Given first aid ☐ Refused care ☐ Emergency (911)

1. What was the employee doing when injured?

2. How did the incident occur? (describe fully)

3. Part of body affected / nature of injury:

4. Object or substance that directly injured the employee:

5. Root causes — why was the unsafe act committed? Why did the unsafe condition exist?

6. Corrective actions to prevent recurrence (what, who, by when):

Supervisor signature _____ Date _____

Safety Coordinator follow-up / closure _____ Date _____

Reminder: fatalities must be reported to OSHA within 8 hours; in-patient hospitalizations, amputations, or loss of an eye within 24 hours (1-800-321-6742). Determine OSHA 300 recordability within 7 days.

Appendix D — First Aid Treatment Form

First Aid Treatment Form

3F Construction LLC • 202 N. Justine Street, Chicago, IL 60607 • (312) 296-4855

Instructions: completed by the treating first-aid attendant after each episode in which a worker receives first aid at a 3F Construction site — including instances in which a worker is offered first-aid treatment or transport and refuses it.

Date of injury/illness _____ Time _____

Date reported (if different) _____ Time reported _____

Location _____ at _____ worksite _____ where _____ injury/illness _____ occurred

Description _____ of _____ injury/
illness _____

How _____ the _____ injury/illness
occurred _____

Injured worker _____ Position _____

First-aid provider _____ Title / _____ qualifications

Witnesses _____ Telephone _____

Was first aid provided? ☐ Yes ☐ No Advised to seek further medical treatment? ☐ Yes ☐ No Offered
transport to medical facility at company expense? ☐ Yes ☐ No

Describe treatment provided / what the worker was advised or offered and the response:

Refusal acknowledgment — I was offered first-aid treatment and/or transport and declined it:

Worker signature _____ Date _____

First-aid provider signature _____ Date _____

Witness signature _____ Date _____

Appendix E — Employee Hazard Report

Employee Hazard Report

3F Construction LLC • 202 N. Justine Street, Chicago, IL 60607 • (312) 296-4855

Use this form to report an unsafe act or condition, or to suggest a safety improvement. Action will be taken whether the form is signed or not. Give the completed form to any supervisor or the Safety Coordinator, or submit it anonymously.

Unsafe act or condition observed:

Location (project / area) _____

Proposed solution:

Date submitted _____ Signature (optional) _____

— Safety Coordinator / management use below this line —

Evaluation and plan of action:

Target completion date _____ Date completed _____

Signature _____ Response given to reporter on _____

Appendix F — New-Hire Safety Orientation Checklist

New-Hire Safety Orientation Checklist

3F Construction LLC • 202 N. Justine Street, Chicago, IL 60607 • (312) 296-4855

Employee _____ Start date _____

Position / crew _____ Project _____

Initial each item as covered:

- ☐ Safety policy statement, this program, and where to find it
- ☐ Hazard reporting, near-miss reporting, and stop-work authority
- ☐ Injury reporting: report immediately; first-aid locations and designated responders
- ☐ Disciplinary procedure and general safety rules (Section 23)
- ☐ PPE issued, fit verified (hard hat, glasses, footwear, hi-vis, gloves, hearing)
- ☐ Fall protection requirements; harness fit and inspection (if exposed)
- ☐ HazCom: labels, pictograms, SDS access, site chemical inventory
- ☐ Silica: Table 1 tasks, wet/vacuum methods, respirator requirements (if applicable)
- ☐ Heat/cold illness prevention: water, rest, shade, buddy system, emergency response
- ☐ Emergency action plan: alarms, exit routes, muster point, severe weather
- ☐ Ladders, scaffolds, electrical/GFCI, housekeeping expectations
- ☐ Tool and equipment authorization; what this employee may and may not operate
- ☐ OSHA 10 status verified / scheduled; card on file ☐
- ☐ Assigned experienced mentor for first weeks (short-service employee)

Employee signature _____ Date _____

Trainer / supervisor signature _____ Date _____

Appendix G — Toolbox Talk / Safety Meeting Record

Toolbox Talk / Safety Meeting Record

3F Construction LLC • 202 N. Justine Street, Chicago, IL 60607 • (312) 296-4855

Project _____ Date / time _____

Presented by _____ Trade(s) _____

Topic(s) covered _____

Site-specific hazards discussed / employee questions raised / corrective items:

Attendee (print) Company Signature

Minutes of safety committee meetings are recorded and forwarded to management.

Appendix H — Jobsite Safety Inspection Checklist

Jobsite Safety Inspection Checklist

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Project _____ Date _____

Inspected by _____ Weather _____

Mark each item S (satisfactory), U (unsatisfactory — describe below), or N/A.

Area	Items	S / U / N/A
Documentation	Site safety plan, posters (OSHA 3165, 300A in season), SDS access, permits, competent persons listed	
Housekeeping	Passageways clear, debris removed, nails bent/pulled, materials stored stable, lighting	
Fall protection	Guardrails, hole covers marked, PFAS worn/inspected, leading edges, rebar caps	
Ladders / stairs	Condition, angle, 3-ft extension, secured, stair rails	
Scaffolds	Competent-person shift inspection, planking, guardrails, access, base	
Electrical	GFCI, cord condition, panels covered/closed, clearance from lines, lockout/tagging	
PPE	Hard hats, eye protection, hi-vis, gloves, hearing, respirators fit and worn	
Silica / dust	Wet methods or HEPA collection in use, no dry sweeping, respirators per Table 1	
Fire prevention	Extinguishers charged/accessible, flammables in safety cans, hot-work permit & fire watch	

Area	Items	S / U / N/A
Excavations	Daily competent-person inspection, protective system, access/egress, spoils 2 ft back, utilities located (JULIE 811)	
Cranes / rigging / hoisting	Inspections current, swing radius barricaded, no loads over workers, tag lines	
Heavy equipment / vehicles	Backup alarms, seat belts, spotters, hi-vis near traffic	
Heat / cold	Water, shade/warm-up area, rest cycles per heat index, buddy system	
Welfare / first aid	First-aid kit stocked, toilets/ wash water, eyewash where needed	
Public protection (Chicago)	Fencing, sidewalk/public-way protection, permits posted, debris containment	

Deficiencies found, corrective action, responsible person, and date corrected:

Inspector signature _____ Reviewed by Safety Coordinator _____