

Construction Safety Program — Ironwood Builders, LLC

Compliance Document

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1. Company Safety Commitment and Responsibilities

CONSTRUCTION SAFETY PROGRAM

Ironwood Builders, LLC
3400 Industrial Boulevard
Denver, CO 80216

Effective Date: [EFFECTIVE DATE]

Ironwood Builders, LLC is committed to providing a safe and healthful workplace for all employees, subcontractors, and visitors at our construction sites. This Construction Safety Program has been developed in compliance with OSHA's Construction Standards (29 CFR 1926) and Colorado state safety regulations.

Management Commitment: The leadership of Ironwood Builders recognizes that worker safety is a core value, not merely a regulatory requirement. Management commits to allocating adequate resources for safety equipment, training, and program maintenance; leading by example with visible safety leadership on every job site; and maintaining open communication about safety concerns without fear of retaliation.

Safety Responsibilities:

- Company Owner / President: Overall responsibility for safety program implementation and resource allocation.
- Project Managers: Ensure site-specific safety plans are developed and implemented for each project. Conduct weekly safety audits.
- Site Superintendents: Daily enforcement of safety rules, conducting toolbox talks, investigating incidents.
- Competent Persons: Designated individuals with training and authority to identify hazards and take corrective action in specific areas (fall protection, excavation, scaffolding, etc.).
- All Employees: Comply with safety rules, report hazards immediately, use required PPE, and participate in safety training.

2. Job Hazard Assessment and Control

Before work begins on any project, the Site Superintendent and Project Manager shall conduct a Job Hazard Analysis (JHA) to identify potential hazards associated with each task and establish control measures.

Hazard Identification Process:

1. Review project plans, specifications, and scope of work
2. Conduct a pre-construction site survey to identify existing hazards (utilities, environmental conditions, adjacent structures)
3. Identify task-specific hazards for each phase of construction
4. Assess hazard severity and probability
5. Establish control measures using the hierarchy of controls

Hierarchy of Controls (in order of preference):

- Elimination: Remove the hazard entirely (e.g., prefabricate components at ground level)
- Substitution: Replace a hazardous material or process with a less hazardous one
- Engineering Controls: Isolate workers from the hazard (e.g., guardrail systems, trench shoring)
- Administrative Controls: Change work practices (e.g., job rotation to limit exposure time, safety signage)
- Personal Protective Equipment: PPE as the last line of defense when other controls are not feasible

JHA documentation shall be maintained on-site and reviewed with all workers during the project safety orientation. JHAs are updated whenever conditions change, new tasks are introduced, or an incident occurs.

3. Fall Protection Program

Fall protection is required for all employees working at heights of 6 feet or more above a lower level, in accordance with 29 CFR 1926, Subpart M.

Fall Protection Systems: Ironwood Builders utilizes the following fall protection systems:

- Guardrail Systems: Toprails at 42 inches (plus or minus 3 inches) above the walking/working surface, midrails at 21 inches, capable of withstanding 200 pounds of force in any direction. Used on scaffolds, leading edges, floor openings, and rooftops where feasible.
- Personal Fall Arrest Systems (PFAS): Full-body harnesses with shock-absorbing lanyards or self-retracting life-lines connected to approved anchorage points rated for 5,000 pounds per worker. Required when guardrails are not feasible.
- Safety Net Systems: Used when work is performed 25 feet or more above ground and other fall protection methods are not practical.
- Covers: All floor holes and openings shall be covered with material capable of supporting twice the weight of employees and equipment. Covers shall be labeled "HOLE" or "COVER" and secured to prevent displacement.

Pre-Use Inspection: All fall protection equipment shall be inspected before each use. Any equipment showing signs of wear, damage, or having been subjected to impact loading shall be immediately removed from service and tagged out. Harnesses and lanyards involved in a fall arrest event shall be destroyed.

Training: All employees exposed to fall hazards shall receive training from a competent person covering fall hazard recognition, fall protection system selection and use, proper harness fitting, anchorage point identification, and rescue procedures.

4. Incident Reporting and Investigation

All work-related incidents, injuries, illnesses, near-misses, and property damage must be reported immediately to the Site Superintendent, regardless of severity.

Reporting Requirements:

- Fatalities: Must be reported to OSHA within 8 hours (1-800-321-OSHA).
- In-patient hospitalizations, amputations, or loss of an eye: Must be reported to OSHA within 24 hours.
- All recordable injuries and illnesses: Documented on OSHA 300 Log and 301 Incident Report form.
- Near-miss incidents: Documented on Company Near-Miss Report form and reviewed for corrective action.

Investigation Process: The Site Superintendent shall initiate an incident investigation within 24 hours. Investigation steps include: securing the scene, interviewing witnesses, photographing conditions, identifying root causes (not assigning blame), developing corrective actions, and documenting findings.

Ironwood Builders maintains a strict non-retaliation policy. No employee shall be disciplined, terminated, or otherwise retaliated against for reporting a safety concern, injury, or near-miss. Retaliation is grounds for disciplinary action against the retaliating party, up to and including termination.