Glass Governor of Atlanta: Safety Policy & Procedures Manual

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Preamble: Our Commitment to Safety

The foundational principle of is an unwavering and non-negotiable commitment to the health and safety of our employees, our clients, and the public. This manual codifies that commitment, establishing the policies, procedures, and responsibilities that govern all company operations. Safety is not merely a matter of regulatory compliance; it is a moral and professional obligation that takes precedence over all other business objectives, including project schedules and client requests. The policies contained herein are derived from this core philosophy and are designed to meet or exceed the standards set forth by the Occupational Safety and Health Administration (OSHA) and to reflect the best practices of the glass and glazing industry.[1]

This document serves as the primary guide for all personnel. Its purpose is to create a predictable, controlled, and safe work environment through the proactive identification, assessment, and mitigation of hazards. The effectiveness of this program relies on the shared responsibility of every individual, from management to each tradesperson on site. Management is tasked with providing the resources, training, and oversight necessary to implement these policies, while every employee is empowered and expected to uphold them.[2]

The use of a "Policy Effective Date" and a "Last Reviewed" date reflects our standard corporate practice for document version control. This ensures that our safety protocols are subject to regular review and remain current with evolving regulations and industry knowledge. This manual represents a deliberate and long-standing framework for ensuring that every project is completed without incident or injury. It is the tangible expression of our belief that a safe worksite is the only acceptable worksite, and it provides the structure through which that belief is put into practice daily. This proactive stance on safety forms the basis for every decision made in the field, ensuring that specific procedures, such as those governing footwear and worksite conditions, are not arbitrary rules but are logical extensions of our primary, overarching commitment to assuring safe and healthful working conditions.[3]

Section 1: General Safety Principles and Responsibilities

1.1. Management and Supervisory Responsibilities

Management at all levels holds the ultimate responsibility for the successful implementation and enforcement of this safety program. This responsibility is active and requires diligent oversight. Key duties include defining the company's safety objectives, providing the necessary budget and funding to support them, and ensuring that a safe work environment is maintained on all projects.[2]

Supervisors and project leads are the direct enforcers of safety at the work level. Their responsibilities include:

- **Providing a Safe Workplace:** Ensuring all worksites are free from recognizable hazards and are in compliance with all policies in this manual and applicable OSHA standards.[5]
- **Furnishing Appropriate PPE:** Assessing workplace hazards and providing employees with the necessary Personal Protective Equipment (PPE) at no cost, where required by law, and ensuring its proper use.[6]
- **Ensuring Adequate Training:** Guaranteeing that no employee is assigned a task for which they have not been adequately trained on the associated hazards and control measures. This includes new hire orientation and task-specific training.[2]
- **Enforcement and Correction:** Conducting regular site inspections to identify and correct unsafe conditions or behaviors immediately. This includes the authority to stop work if necessary to abate a hazardous condition.[9]

1.2. Employee Rights and Responsibilities

The success of this safety program is contingent upon the active participation and compliance of every employee. Each employee has a responsibility to themselves and their coworkers to work safely.

Employee responsibilities include:

- **Compliance:** Adhering to all safety rules, regulations, and procedures outlined in this manual and by OSHA.
- **Proper Use of Equipment:** Using all tools, equipment, and PPE correctly and in accordance with training and manufacturer specifications.[2]
- **Hazard Reporting:** Promptly reporting any unsafe conditions, near-misses, or injuries to their supervisor. The company maintains a strict non-retaliation policy for the good-faith reporting of safety concerns.[10]
- **Refusal of Unsafe Work:** Employees have the right and responsibility to refuse to perform

any task they reasonably believe to be unsafe or for which they have not received adequate training.

Employees have the fundamental right to a workplace free from recognized hazards that are causing or are likely to cause death or serious physical harm. This includes the right to receive information and training about workplace hazards and to report issues without fear of reprisal.[3]

1.3. The Hierarchy of Hazard Controls

adopts the nationally recognized Hierarchy of Controls as its guiding framework for mitigating workplace hazards. This systematic approach prioritizes the most effective and reliable control measures over less effective ones. The hierarchy, in descending order of effectiveness, is:

1. **Elimination:** Physically removing the hazard from the workplace. This is the most effective control.
2. **Substitution:** Replacing a hazardous material or process with a less hazardous one.
3. **Engineering Controls:** Isolating people from the hazard through physical changes to the workplace, such as machine guards, ventilation systems, or guardrails.
4. **Administrative Controls:** Changing the way people work through procedures, training, or signage.
5. **Personal Protective Equipment (PPE):** Protecting the worker with equipment worn by the individual. PPE is considered the last line of defense and is used only when higher-level controls are not feasible or to supplement existing controls.

This framework informs all safety-related decisions within the company. For example, a decision to prohibit a certain activity or piece of equipment is often based on the principle of *Elimination*—removing the hazard entirely is superior to relying on PPE to protect against it. This structured approach ensures that our safety policies are based on objective risk reduction principles, not arbitrary preference.

1.4. Job Hazard Analysis (JHA) and Pre-Task Planning

Before the commencement of any new project or non-routine task, a Job Hazard Analysis (JHA) or Pre-Task Plan (PTP) must be completed by the supervisor and the employees involved. This process is a cornerstone of our proactive safety culture.[2]

The JHA process involves:

1. **Breaking Down the Job:** Listing the basic steps of the task in order of occurrence.
2. **Identifying Potential Hazards:** For each step, identifying what could go wrong. This includes assessing risks from the environment (e.g., uneven ground, poor lighting),

materials (e.g., sharp glass edges, chemical exposure), and equipment (e.g., pinch points, electrical hazards).[11]

3. **Developing Preventive Measures:** Determining the specific controls (referencing the Hierarchy of Controls) that will be implemented to eliminate or mitigate each identified hazard.

The completed JHA serves as a guide for performing the job safely and is a key component of pre-task safety briefings, often referred to as "Toolbox Talks".[2]

Section 2: Worksite Condition and Housekeeping

A clean, organized, and well-maintained worksite is fundamental to preventing injuries, particularly Slips, Trips, and Falls (STFs), which are among the most common causes of workplace injuries.[5] The company mandates strict adherence to housekeeping standards at all times.

2.1. Maintaining Clear and Safe Access and Egress

All places of employment, passageways, storerooms, and walking-working surfaces must be kept in a clean, orderly, and sanitary condition, as required by OSHA Standard 1910.22(a)(1).[5] Aisles and passageways shall be kept clear and in good repair to provide for the free and safe movement of employees and material handling equipment.[12] This includes ensuring that exits and paths to exits are never obstructed.

2.2. Control of Debris, Cords, and Protruding Objects

The accumulation of materials that constitute a hazard from tripping, fire, or explosion is strictly prohibited.[12] Specific requirements include:

- **Debris Removal:** Work areas must be kept clear of debris, scrap materials, and loose tools. Housekeeping is an ongoing process, not an end-of-day task.[13]
- **Spill Control:** All spills, whether liquid or dry, must be cleaned up immediately. If a floor is wet, warning signs or barricades must be used to alert personnel until the surface is completely dry.[9]
- **Cord and Cable Management:** Electrical cords, hoses, and welding leads must be routed away from high-traffic areas whenever possible. If crossing a walkway is unavoidable, the cords must be secured and covered with a high-visibility, beveled-edge cable cover to prevent a tripping hazard. OSHA officially recognizes any change in floor level of ¼ inch or more as a potential tripping hazard.[9]

2.3. Illumination and Visibility Standards

Adequate lighting is a critical component of hazard recognition. All work areas, stairways, aisles, and storage areas must be provided with sufficient illumination to ensure that potential hazards such as debris, spills, or uneven surfaces are clearly visible.[14] Employees are required to report any burnt-out bulbs or inadequately lit areas to their supervisor immediately for correction.[15]

2.4. Weather-Related Hazard Mitigation

Weather conditions can introduce significant slip hazards. Procedures must be in place to manage these risks:

- **Water and Ice:** Entryways can become hazardous during rain or snow. High-traction, beveled-edge mats must be placed at all entrances to allow employees to clean and dry their footwear.[13] Outdoor work surfaces and pathways that are affected by ice or snow must be treated with sand, salt, or other suitable materials to improve traction.[9]
- **Mud and Debris:** Construction sites are often muddy. Designated pathways should be established, and where necessary, gravel or temporary walkways should be used to provide stable footing.[16]

This comprehensive focus on STF prevention is essential. It establishes the context for all other related policies, demonstrating that any single rule—such as the policy on footwear—is not an isolated decision but one component of a holistic, system-wide commitment to eliminating these pervasive and dangerous hazards.

Section 3: Personal Protective Equipment (PPE) Policy

Personal Protective Equipment (PPE) is the last line of defense in the Hierarchy of Controls. When hazards cannot be eliminated or engineered out of the work process, PPE is mandatory. This section outlines the minimum PPE requirements for employees.

3.1. General Requirements and Proper Use

The company is responsible for conducting a hazard assessment to determine the necessary PPE for each task and for providing the appropriate equipment to employees.[17] All employees are required to:

- Use company-provided PPE in accordance with training and instructions.
- Inspect their PPE before each use for any damage or defects.
- Immediately remove from service and report any defective PPE to their supervisor for

replacement.[18]

- Properly clean and maintain their assigned PPE.

3.2. Head Protection

Hard hats compliant with American National Standards Institute (ANSI)/International Safety Equipment Association (ISEA) Z89.1 must be worn in all designated areas, including any location with a risk of falling objects or head impact.[2]

3.3. Eye and Face Protection

Eye and face protection is mandatory for a wide range of tasks in the glazing industry. The minimum requirement for any work on site is a pair of ANSI Z87.1-compliant safety glasses with side shields.[2] More protective equipment, such as sealed goggles or full-face shields, is required for tasks that generate a high volume of dust, debris, or flying particles, such as cutting, grinding, or chipping.[8]

3.4. Hand and Arm Protection

Hands and arms are particularly vulnerable to cuts and lacerations when handling glass. All employees handling glass, sheet metal, or other sharp-edged materials must wear appropriate, snug-fitting, cut-resistant gloves.[19]

3.5. Foot Protection and Worksite Footwear Mandate

Proper footwear is a critical safety control that provides protection from multiple hazards simultaneously: impact, puncture, and slips. The integrity of an employee's footing is paramount, especially when handling heavy, awkward, and dangerous materials like glass.

3.5.1. Mandatory Footwear Specifications

All personnel present on a worksite must wear protective footwear that meets the specifications of the **ASTM F2413, "Standard Specification for Performance Requirements for Protective Footwear."**.[6] This is a non-negotiable requirement. The employer is responsible for assessing the worksite and ensuring employee footwear provides adequate protection against identified hazards.[17]

At a minimum, all mandated footwear must include the following features:

- **Impact and Compression Resistant Toe:** Safety-toed footwear (e.g., steel, alloy, or composite) is required to prevent crushed toes from falling objects or heavy equipment.
- **Puncture-Resistant (PR) Soles:** To protect against nails, screws, broken glass, and other sharp debris commonly found on construction sites, all footwear must have a

puncture-resistant plate built into the sole.

- **Slip-Resistant Soles:** Footwear must be equipped with slip-resistant soles designed for traction on a variety of surfaces found in construction environments. The sole pattern and material must provide a high coefficient of friction to prevent slips on both wet and dry surfaces.

3.5.2. Policy on Disposable Shoe Coverings

This policy is established to address a direct and significant conflict between client requests for floor covering and the company's primary duty to ensure employee safety by eliminating foreseeable hazards.

- **Statement of Policy:** Standard disposable shoe coverings, commonly known as "booties," are not a form of Personal Protective Equipment. The use of such coverings is **expressly prohibited** for any employee engaged in the manual or mechanical transport of glass, tools, or other heavy materials. This prohibition also applies during any task that requires dynamic movement, climbing, or traversing potentially uneven or cluttered surfaces.
- **Justification:** This policy is a direct application of the Hierarchy of Controls, prioritizing the *elimination* of a severe slip hazard. Slips, trips, and falls are a leading cause of serious and fatal injuries in the construction industry.[9] The stability of an employee carrying a heavy, large, and fragile glass panel is a critical safety factor. Disposable shoe coverings, typically made from materials like polypropylene (PP) or crosslinked polyethylene (CPE), dangerously reduce the coefficient of friction between the boot sole and the walking surface.[23] These materials can become exceptionally slippery when exposed to even small amounts of moisture or dust. They also obscure the tread of the mandated slip-resistant footwear, rendering a critical safety feature useless.[24] The risk of a catastrophic fall resulting from a slip caused by these coverings—endangering the employee, the product, and the jobsite—is unacceptable. The integrity of the interface between the boot sole and the walking surface is a safety control that will not be compromised.
- **Discretionary Use Clause:** The use of shoe coverings may be permitted as a courtesy to the client under a very limited set of circumstances. This is only allowable during low-risk, static activities conducted *after* all glass panels, heavy tools, and equipment have been moved into place. Examples include applying final sealant, conducting final measurements, or completing paperwork. The decision to wear shoe coverings, even in these low-risk situations, rests **solely with the trained employee**, who must perform a real-time risk assessment of the specific flooring material and surface conditions. If the employee, in their professional judgment, deems the surface presents a potential slip risk, they will not wear the coverings. Safety will not be compromised for courtesy.

Section 4: Safe Handling, Transport, and Storage of Glass

The specialized nature of glass and glazing work (SIC Code 1793) necessitates specific procedures to manage the inherent risks of the material.[1] Adherence to these protocols is mandatory for all personnel. This detailed focus demonstrates that our safety policies are not generic but are tailored to the unique demands of our trade, lending credibility to the entire safety program.

4.1. Manual and Team Lifting Protocols

Improper manual handling is a primary cause of both personal injury and material damage.

- **Carrying Technique:** Always carry glass lites vertically, with two hands, and to your side. Never carry glass under one arm or above your head.[8]
- **Team Lifting:** Large or heavy sheets of glass must always be moved by a team of two or more people to distribute the weight evenly and maintain stability. When possible, team members should be of similar height to prevent unequal load distribution.[8]
- **Body Positioning:** Always maintain a body position that is out of the "line of fire" in the event of breakage. Keep loads close to the body and lift with the legs, not the back, to prevent muscle strains.[11]

4.2. Glass Inspection

No piece of glass should be assumed to be flawless. A thorough inspection prior to handling is a critical step in preventing unexpected breakage.

- **Pre-Handling Check:** Before lifting or moving any piece of glass, it must be thoroughly inspected for defects such as cracks, chips, scratches, or edge damage. Even minor imperfections can compromise the structural integrity of the glass, making it susceptible to failure under stress.[8]
- **Damaged Material:** Any glass found to be damaged must be immediately segregated and marked for safe disposal. It must not be installed.

4.3. Mechanical Lifting Aids

For large or heavy glass units, mechanical aids are the preferred method of handling, in line with the Hierarchy of Controls.

- **Suction Cups/Vacuum Lifters:** All mechanical lifting devices must be inspected before each use, paying close attention to the condition of the vacuum pads and power systems. Aged or weathered pads must be replaced.[25]
- **Safe Operation:** When using vacuum lifters, operators must constantly monitor vacuum levels. All personnel must be trained to never stand under a suspended load. Tag lines

should be used to control the movement of the load and prevent swinging.[8]

4.4. Storage and Racking

Proper storage is essential for preventing damage and ensuring a safe worksite.

- **Securing Materials:** All materials stored in tiers must be stacked, racked, blocked, or otherwise secured to prevent sliding, falling, or collapse, per OSHA 1926.250(a)(1).[12]
- **Glass Racks:** Glass must be stored upright in designated racks designed for that purpose. When transporting glass on a rack, whether by forklift or truck, it must be securely strapped to the rack to prevent shifting or falling.[18]

4.5. Procedures for Handling Broken Glass

In the event of glass breakage, specific procedures must be followed to prevent injury.

- **Do Not Catch Falling Glass:** Never attempt to catch or stop a falling piece of glass. Move away to a safe location immediately.[18]
- **Safe Cleanup:** Never handle broken glass with bare hands. Use a broom and a dustpan for cleanup. For fine particles, a vacuum may be used.[11]
- **Disposal:** All broken glass and sharp scraps must be placed in clearly labeled, puncture-resistant containers for disposal. Scraps must fit completely inside the container.[11]

Section 5: Fall Protection and Work at Heights

Falls from height are a leading cause of fatalities in the construction industry. enforces a strict fall protection policy in accordance with OSHA Subpart M.

5.1. Ladder Safety

- **Inspection:** All ladders must be inspected by a competent person for any defects before each use. Damaged ladders must be immediately removed from service and tagged "Dangerous, Do Not Use".[13]
- **Proper Setup and Use:** Ladders must be placed on stable, level surfaces. When using an extension ladder, it must be set up at the proper 1-to-4 angle and extend at least 3 feet above the landing point. Employees must maintain three points of contact (two hands and a foot, or two feet and a hand) at all times when climbing or descending.[15]
- **Prohibited Actions:** Never stand on the top cap or top rung of a stepladder. Never exceed the ladder's maximum load rating. Never use metal ladders near energized electrical equipment.[13]

5.2. Scaffolding

- **Erection and Inspection:** Scaffolding must be erected, moved, or dismantled only under the supervision of a competent person. It must be inspected before each work shift.
- **Fall Protection:** Scaffolding higher than 10 feet must be equipped with guardrails, mid-rails, and toeboards on all open sides and ends.[13]
- **Load Capacity:** Scaffolds must be capable of supporting their own weight and at least four times the maximum intended load applied to them.[13]

5.3. Aerial and Scissor Lifts

- **Operator Certification:** Only trained and certified personnel are authorized to operate aerial or scissor lifts.[2]
- **Personal Fall Arrest Systems (PFAS):** When working from an articulating or telescoping boom lift, all occupants must wear a personal fall arrest system (body harness and lanyard) and attach it to the designated anchor point inside the basket.[3]
- **Safe Operation:** Lifts must be operated on level surfaces. Outriggers must be used if equipped. Workers must not lean or climb on the guardrails.[28]

5.4. Guarding Floor Openings and Unprotected Edges

Any open-sided floor or platform 6 feet (for construction) or 4 feet (for general industry) or more above a lower level must be protected from falling by a standard guardrail system, safety net system, or personal fall arrest system.[13] This includes protecting floor openings, hoistways, and the perimeters of buildings under construction.

Section 6: Client Relations and Property Protection

is committed to delivering a high-quality finished product and respecting client property. This commitment, however, must be balanced with our non-negotiable duty to ensure worker safety. This section outlines our professional approach to protecting finished surfaces, which utilizes methods that are safer and more effective than disposable shoe coverings. This approach transforms a potential point of conflict into a demonstration of superior professionalism and expertise.

6.1. Communicating Safety Protocols to Clients

Proactive communication is key to a successful project. At the project outset, the project manager or supervisor will communicate key safety protocols to the client or general contractor. This includes explaining that our safety procedures, which are designed to comply with federal

law and protect our personnel from serious injury, are not subject to negotiation. This sets clear expectations and establishes our professional stance on safety from the beginning.

6.2. Approved Methods for Protecting Finished Surfaces

Our standard procedure for protecting finished floors and surfaces is based on engineering controls that provide robust protection against a wide range of potential damage while maintaining a safe walking surface for our crews.

- **Primary Method:** The company's standard practice is to protect high-traffic pathways and work areas with durable, impact-resistant materials before the transport of glass and heavy tools begins. Approved materials include:
  - **Corrugated Plastic Sheeting (e.g., Plasti-Shield™):** Lightweight, water and chemical resistant, impact-resistant, and reusable. It can be easily cut to fit complex floor plans.[30]
  - **Hardboard (Masonite):** Provides excellent protection against dents, scratches, and impacts from dropped tools or rolling equipment.
  - **Heavy-Duty Rolled Paper or Cardboard:** A cost-effective solution for protection against dirt, dust, and minor spills.
- **Implementation:** All protective materials will be laid flat and securely taped at all seams and edges using appropriate construction tape (e.g., blue painter's tape for delicate surfaces). This practice is critical to prevent the material from curling or shifting, which could create a trip hazard.[30]
- **Rationale for Superiority:** This methodology provides far greater protection than disposable shoe covers. It safeguards floors not just from dirt, but from the more significant risks of scratches from debris, dents from dropped tools, cracks in tile from impact. By implementing this superior system, we demonstrate a higher level of care for the client's property.

The following table illustrates the company's risk-based assessment of floor protection methods, clarifying why certain methods are mandated and others are prohibited.

Control Level	Method	Protection Offered	Safety Risk Introduced
Engineering Control (Most Effective & Mandated)	Hardboard or Corrugated Plastic Sheeting	High protection against Dirt, Scratches, Spills, Gouges, and Impacts.	**Low.** Risk is minimal and is controlled by properly taping all seams and edges to prevent tripping.
Administrative Control (Supplemental)	High-Traction Walk-Off Mats at Entrances	Good protection against tracked-in Dirt and Moisture at entry points.	**Low.**
PPE-Related (Ineffective & Hazardous)	Disposable Shoe Covers	Minimal protection against light, dry dirt only. No protection against impact, scratches, or spills.	**High.** Creates a significant slip hazard by covering the tread of mandated safety footwear, reducing the coefficient of friction. Risk of a catastrophic fall is unacceptable.

By proactively implementing a more robust and professionally recognized system of floor protection, ensures that both client property and employee safety are held to the highest standard.

Appendix A: Referenced Regulations and Standards

The policies and procedures outlined in this manual are based on and designed to comply with established federal regulations and consensus industry standards. Key references include, but are not limited to:

- **Occupational Safety and Health Administration (OSHA), U.S. Department of Labor:**
  - OSHA 29 CFR 1910.22 - General Requirements for Walking-Working Surfaces
  - OSHA 29 CFR 1910.132 - Personal Protective Equipment, General Requirements
  - OSHA 29 CFR 1910.136 - Foot Protection
  - OSHA 29 CFR 1926.250 - Subpart H, Materials Handling, Storage, Use, and Disposal
  - OSHA 29 CFR 1926.501 - Subpart M, Duty to Have Fall Protection
  - OSHA 29 CFR 1926.502 - Subpart M, Fall Protection Systems Criteria and Practices
- **ASTM International (formerly American Society for Testing and Materials):**
  - ASTM F2412 - Standard Test Methods for Foot Protection
  - ASTM F2413 - Standard Specification for Performance Requirements for Protective Footwear
- **American National Standards Institute (ANSI) / International Safety Equipment Association (ISEA):**
  - ANSI/ISEA Z87.1 - American National Standard for Occupational and Educational Personal Eye and Face Protection Devices
  - ANSI/ISEA Z89.1 - American National Standard for Industrial Head Protection