STATE COMPLIANCE EXHIBIT

PENNSYLVANIA

Safety & Environmental Management Program | 2026 Edition

Exhibit To	NM&C Safety & Environmental Management Program (PRG-SAF-10282026-01)
Jurisdiction	**Federal OSHA**
Version	1.1
Effective Date	November 16, 2026
Next Scheduled Review	November 16, 2027

HOW THIS EXHIBIT WORKS

This exhibit is part of the NM&C Safety & Environmental Management Program for all commercial construction projects and facility maintenance service calls located in Pennsylvania. The master program applies in full; this exhibit adds the Pennsylvania requirements that go beyond, or differ from, the federal OSHA baseline used in the master.

When this exhibit, the master program, a local rule, a customer requirement or a contract differ, the most protective requirement applies. This exhibit summarizes key requirements and is not a complete list of every state or local law. Fill-in fields are highlighted in yellow.

1 OSHA JURISDICTION AND SERIOUS INJURY REPORTING

Coverage for NM&C work	Federal OSHA - Pennsylvania has no OSHA-approved State Plan; private-sector employers are under federal OSHA jurisdiction (HB 308 of 2025, a public-employee OSH bill, passed the House and has been in Senate committee since April 30, 2025).
Serious injury and fatality reporting	Report fatalities to federal OSHA within 8 hours and in-patient hospitalizations, amputations or eye losses within 24 hours (29 CFR 1904.39) by phone (1-800-321-6742), online or to the nearest Area Office.
Master program sections	Section 35 (Reporting), Section 38 (Recordkeeping) and Section 43 (State Compliance Exhibits).

2 PENNSYLVANIA REQUIREMENTS

Item / Topic	Requirement
2.1 OSHA Jurisdiction	Private-sector work in Pennsylvania is covered by federal OSHA. HB 308 (Public Employees OSH Act) would cover only public employers; it passed the House 111-92 on April 9, 2025 and was referred to the Senate Labor & Industry Committee on April 30, 2025, with no further action as of Oct 2026. (PA General Assembly - HB 308 (2025-2026) bill history)
2.2 Written Program, Committees and Training	None beyond federal statewide. In Philadelphia, every worker doing permit-regulated construction or demolition needs OSHA 10 Construction, with proof kept on site; licensed contractors (other than plumbing, electrical and fire suppression) must identify an OSHA 30-trained supervisor, and major buildings need an OSHA 30 site safety manager. (Philadelphia L&I - Contractor requirements (OSHA training))

2.3 Permits, Licenses and Utility Locates	Operators of cranes rated 15 tons or more (tower cranes 10 metric tons or more) need a license from the State Board of Crane Operators, which requires current national certification such as NCCCO (Crane Operator Licensure Act, Act 100 of 2008, 63 P.S. 2400.101 et seq.). (PA Department of State - Crane Operator Licensure Snapshot)
2.4 Permits, Licenses and Utility Locates	Contact PA One Call (811) at least 3 business days before excavation. (PA PUC - PA One Call 811)
2.5 Asbestos, Lead and Environmental	Under the Asbestos Occupations Accreditation and Certification Act, abatement of more than 3 sq ft or 3 linear ft of friable asbestos requires notice at least 5 calendar days ahead and L&I-certified contractors, supervisors and workers; the notice is filed on DEP's form through GreenPort (NESHAP projects need 10 working days). Philadelphia and Allegheny Counties use their local agencies. (PA L&I - Asbestos Occupations (notification and certification))
2.6 Asbestos, Lead and Environmental	Report environmental emergencies such as spills to DEP at 800-541-2050. (PA DEP - Report Incidents and Complaints)
2.7 Workers' Compensation Injury Reporting	File the employer's first report of injury with the Bureau within 48 hours for a death and within 7 days after disability begins when the injury causes disability for the full day, shift or turn of injury or longer; send a copy to the employee at the same time (34 Pa. Code 121.5). (34 Pa. Code Chapter 121 (121.5))
2.8 Drug Testing and Cannabis	The Medical Marijuana Act bars adverse action based solely on an employee's certified-patient status but lets employers discipline for workplace impairment (35 P.S. 10231.2103). (Medical Marijuana Act Section 2103)
2.9 Driving	Yes - Paul Miller's Law (Act 18 of 2024) bans handheld device use while driving, even when temporarily stopped. It took effect June 5, 2025 with a 12-month written-warning period; since June 5, 2026 a violation is a summary offense with a $50 fine plus costs. (PennDOT - Distracted Driving (Paul Miller's Law))

3 PROJECT START-UP CHECKLIST

Project / Customer	Enter	**Work Order / Project No.**	Enter
Site Address	Enter	**City / County**	Enter
NM&C Project Manager	Enter	**Date Reviewed**	Enter

Requirement	Applies?	Action Taken / Notes
2.1 OSHA Jurisdiction: Private-sector work in Pennsylvania is covered by federal OSHA. HB 308 (Public Employees OSH Act) would cover…	Yes / No / N/A	Action / notes
2.2 Written Program, Committees and Training: None beyond federal statewide. In Philadelphia, every worker doing permit-regulated construction or…	Yes / No / N/A	Action / notes
2.3 Permits, Licenses and Utility Locates: Operators of cranes rated 15 tons or more (tower cranes 10 metric tons or more) need a license from the State…	Yes / No / N/A	Action / notes
2.4 Permits, Licenses and Utility Locates: Contact PA One Call (811) at least 3 business days before excavation.	Yes / No / N/A	Action / notes
2.5 Asbestos, Lead and Environmental: Under the Asbestos Occupations Accreditation and Certification Act, abatement of more than 3 sq ft or 3…	Yes / No / N/A	Action / notes
2.6 Asbestos, Lead and Environmental: Report environmental emergencies such as spills to DEP at 800-541-2050.	Yes / No / N/A	Action / notes
2.7 Workers' Compensation Injury Reporting: File the employer's first report of injury with the Bureau within 48 hours for a death and within 7 days…	Yes / No / N/A	Action / notes
2.8 Drug Testing and Cannabis: The Medical Marijuana Act bars adverse action based solely on an employee's certified-patient status but lets…	Yes / No / N/A	Action / notes
2.9 Driving: Yes - Paul Miller's Law (Act 18 of 2024) bans handheld device use while driving, even when temporarily…	Yes / No / N/A	Action / notes
Local (city or county) safety, permit or training requirements confirmed	Yes / No / N/A	Describe local rules

4 REFERENCES

- Philadelphia L&I - Contractor requirements (OSHA training)
- PA Department of State - Crane Operator Licensure Snapshot
- PA PUC - PA One Call 811
- PA L&I - Asbestos Occupations (notification and certification)
- PA DEP - Report Incidents and Complaints
- 34 Pa. Code Chapter 121 (121.5)
- Medical Marijuana Act Section 2103
- PennDOT - Distracted Driving (Paul Miller's Law)
- PA General Assembly - HB 308 (2025-2026) bill history

5 REVIEW AND APPROVAL

Role	Printed Name and Signature	Date
NM&C Project Manager	Name / Signature	Date
Safety Department	Name / Signature	Date